

217/782-2113

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT
and
TITLE I PERMIT¹

PERMITTEE

A. E. Staley Manufacturing Company
Attn: Richard L. Dickinson
2200 East Eldorado Street
Decatur, Illinois 62521

Application No.: 96020099

I.D. No.: 115015ABX

Applicant's Designation:

Date Received: February 26, 1996

Operation of: Corn Wet Milling Plant

Date Issued: August 12, 2003

Expiration Date: August 11, 2008

Source Location: 2200 East Eldorado Street, Decatur Macon County

Responsible Official: Rand P. Roslak, Plant Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a corn wet milling plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this, please call Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:AB:jar

cc: Illinois EPA, FOS, Region 3
USEPA

¹ This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

² Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

A. E. Staley Manufacturing Company
2200 East Eldorado Street
Decatur, Illinois 62521
217/423-4411

I.D. No.: 115015ABX
Standard Industrial Classification: 2046, Wet Corn Milling

1.2 Owner/Parent Company

A. E. Staley Manufacturing Company
2200 East Eldorado Street
Decatur, Illinois 62521

1.3 Operator

A. E. Staley Manufacturing Company
2200 East Eldorado Street
Decatur, Illinois 62521

Richard L. Dickinson
217/421-2152

1.4 General Source Description of Source

A. E. Staley Manufacturing Company is located at 2200 East Eldorado Street in Decatur and is involved in the processing of raw corn and producing a variety of products including starches, animal feeds, dextrose, and other products.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollution Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through E), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27717
ATUs	Allotment Trading Units
BAT	Best Available Technology
Btu	British thermal unit
°C	degrees Celsius
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
cfm	cubic foot per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
°F	degrees Fahrenheit
ft	feet
ft ³	cubic foot
g	grams
gal	gallon
gr	grains
HAP	Hazardous Air Pollutant as listed in the Clean Air Act
Hp	Horsepower
hr	hour
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
Illinois EPA	Illinois Environmental Protection Agency
kg	kilogram
l	liter
lb	pound
LEL	Lower Explosive Limit
m	meter
MACT	Maximum Achievable Control Technology
mmBtu/hr	Million Btu per hour
mg	milligrams
mmHg	millimeters of mercury
mmscf	million standard cubic feet
mo	month
MW	Megawatts
NESHAP	National Emission Standards for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NO _x	Nitrogen Oxides including Nitrogen Dioxide
Odor Nuisance	An affirmative finding by the Illinois Pollution Control Board that a specific emission unit is causing an odor nuisance
PM	Particulate Matter
PM ₁₀	Particulate Matter < 10 microns, as measured by applicable test methods specified in the applicable rule
ppm	Parts Per Million
PSD	Prevention of Significant Deterioration

psia	pounds per square inch absolute
RMP	Risk Management Plan
scf	standard cubic feet
scm	standard cubic meters
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide
T	Tons
T1	Title I - identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
VOM	Volatile Organic Material, including VOM HAPs listed in the Clean Air Act
wt.	weight
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

- a. Wet Mill Area
 - i. Zeolite Tanks
 - ii. Triple Head Tank
 - iii. GT Head Tank
 - iv. Germ Cooler
- b. Starch Area
 - i. Starch Reactor Vessels
 - ii. Miracleer, Settler and Kelly Tanks
 - iii. Dorrclone Feed Tank
 - iv. Bleach Tanks
 - v. Hydrogen Peroxide Storage Tanks
 - vi. Sulfuric Acid Tank
 - vii. Chemical Tanks
 - viii. Skimming Tank
- c. VICO Area
 - i. Base Treat Tanks
 - ii. Process Tank
- d. Refinery Area
 - i. Vacuum Jets
 - ii. Spent Carbon Vacuum Pumps
 - iii. Betz Chemical Storage Tank
 - iv. Floor Catch All Tank

- v. Resin Slurry Tank
- vi. Thinning Reactors
- vii. Filteraid Vacuum Pump
- viii. Ion Exchange Vessel
- ix. Process Tank
- x. Boiltank
- xi. Mud Centrifuges
- xii. Flush Tank and Mud Hopper
- xiii. Sodium Magnesium Bisulfite Tank
- xiv. Syrup Spreader
- xv. Magnesium Sulfate Tank
- xvi. Steam Condensate Tank
- e. Dextrose Area
 - i. Evaporators
- d. Utilities Area
 - i. Ammonia Storage Tank
 - ii. Hydrogen Peroxide Storage Tank
 - iii. NH_4OH Storage Tank

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

- a. Furnaces used for melting metals other than beryllium with a brim full capacity of less than 450 cubic inches by volume [35 IAC 201.210(a)(6)].
- b. Storage tanks of organic liquids with a capacity of less than 10,000 gallons and an annual throughput of less than 100,000 gallons, provided that the tank is not used for the storage of gasoline or any listed hazardous air pollutant pursuant to Section 112(b) of the Clean Air Act [35 IAC 201.210(a)(10)].

- c. Storage tanks of virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].
- d. Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.2.2), the Permittee shall comply with the following requirements, as applicable:

- 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
- 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

- 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

- 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12) (b) of the Act.
- 3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit	Equipment	Description/Construction Dates
Group 1	Elevator Area	Corn handling and processing in Buildings #25 and #28 Dates of Construction: Prior to 1978
Group 2	Wet Milling Area	Wet milling is performed in Buildings #3, #4, #6, #11, #75, ##153-155
Group 3	Starch Area	Starch Slurry processing is performed in Buildings #7, #7A, #26, #34, #37, #134 :
Group 4	VICO and Pilot Plant Areas	VICO process operations are performed in Building #111; Pilot Plant Operations (Buildings #59, #114, #115, #119)
Group 5	Refinery Area	Buildings #10, #16, #17, #85 Dates of Construction:
Group 6	Dextrose Unit	Buildings #44 and #99
Group 7	Utilities	Boilers #23, #25, #26, #27, #28 (Building #1) Dates of Construction: #23, #25, #26 Prior to 1972; #27, #28 - 1989 Boilers #1, #2 (Building #123) Dates of Construction: 1985
Group 8	Coal Handling and Ash Processing Units	Building #123 Dates of Construction:
Group 9	Gasoline Storage Tank	Date of Construction: 1987
Group 10	Fugitive Emissions	N/A

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

- 5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM, NO_x, SO₂, PM₁₀, CO, and HAPs emissions.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.

- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:

- a. No person shall cause or allow the emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
- b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123 (b) and 35 IAC 212.124. In reference to 212.124, the 8.6.2 requirement to submit a test plan at least 60 days in advance is waived because 212.124 requires that any testing be done within 60 days and does not allow for 8.6.2 to be followed.

5.2.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.

- 5.2.5
 - a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
 - b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.

- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.
- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:
 - i. Illinois EPA, Compliance Section; and
 - ii. For sources located in Cook County and outside of the city of Chicago: Cook County Department of Environmental Control; or
 - iii. For sources located within the city of Chicago: Chicago Department of Environmental Control.

5.2.7 This stationary source has a pollutant-specific emissions unit that is subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources. The source must submit a CAM plan for each affected pollutant-specific emissions unit upon application for renewal of the initial CAAPP permit, or upon a significant modification to the CAAPP permit for the construction or modification of a large pollutant-specific emissions unit which has the potential post-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

5.3 Non-Applicability of Regulations of Concern

This source is not subject to 35 IAC 215.342 and 40 CFR Part 63, Subpart GGGG "Solvent Extraction for Vegetable Oil Production", because the Permittee does not perform any corn oil extraction/processing at this site.

5.4 Source-Wide Operational and Production Limits and Work Practices

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source are not established for fee purposes because the Permittee pays maximum annual fee of \$250,000 for emissions from this site [Act 415 ILCS 5/1et seq., Title X, Section 39.5, Subsection 18(a)(ii)(A)].

5.5.2 Emissions of Hazardous Air Pollutants

Source-wide emissions for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.5.3 Other Source-Wide Emission Limitations

None

5.6 General Recordkeeping Requirements

5.6.1 Emission records

The Permittee shall maintain records of the following items for the source, pursuant to Section 39.5(7)(b) of the Act:

Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.8 General Operational Flexibility/Anticipated Operating Scenarios

N/A

5.9 General Compliance Procedures

5.9.1 General Procedures for Calculating Allowable Emissions

Compliance with the source-wide emission limits specified in Condition 5.5 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and compliance procedures in Section 7 (Unit Specific Conditions) of this permit.

5.9.2 Compliance with Other Pending Applications/Permits

This permit does not relieve the Permittee from compliance with any future issued permit(s) that would be issued by the Illinois EPA (Bureau of Air) to the source after approval of the currently pending applications.

6.0 NO_x TRADING PROGRAM

6.1 Description of NO_x Trading Program

The NO_x Trading Program is a regional "cap and trade" market system for large sources of NO_x emissions in the eastern United States, including Illinois. It is designed to reduce and maintain NO_x emissions from the emission units covered by the program within a budget to help contribute to attainment and maintenance of the ozone ambient air quality standard in the multi-state region covered by the program, as required by Section 126 of the CAA. The NO_x Trading Program applies in addition to other applicable requirements for NO_x emissions and in no way relaxes these other requirements.

Emission units that are subject to the NO_x Trading Program are referred to as "budget units." Sources that have one or more budget unit subject to the NO_x Trading Program are referred to as budget sources.

The NO_x Trading Program controls NO_x emissions from budget units during a seasonal control period from May 1 through September 30 of each year, when weather conditions are conducive to formation of ozone in the ambient air. (In 2004, the first year that the NO_x Trading Program is in effect, the control period will be May 31 through September 30.) By November 30 of each year, the allowance transfer deadline, each budget source must hold "NO_x allowances" for the actual NO_x emissions of its budget units during the preceding control period. The USEPA will then retire NO_x allowances in the source's accounts in amounts equivalent to its seasonal emissions. If a source does not have sufficient allowances in its accounts, USEPA would subtract allowances from the source's future allocation for the next control period and impose other penalties as appropriate. Stringent monitoring procedures developed by USEPA apply to budget units to assure that actual emissions of NO_x emissions are accurately determined.

The number of NO_x allowances available for budget sources is set by the overall budget for NO_x emissions established by USEPA. This budget requires a substantial reduction in NO_x emissions from historical levels as necessary to meet air quality goals. In Illinois, separate rules have been established for the budget units that are electrical generating units (EGU) and for large units at manufacturing plants and institutions (non EGU), like the boilers at this source. Under these rules, the allocation or share of the NO_x allowances for non-EGU is set in an amount established by rule [35 IAC Part 217, Appendix E]. New budget unit, for which limited operating data may be available, may obtain NO_x allowances from the new source set-aside (NSSA), a portion of the overall budget reserved for new budget units.

In addition to directly receiving or purchasing NO_x allowances as described above, budget sources may transfer NO_x allowances from one of their units to another. They may also purchase allowances in the marketplace from other sources that are willing to sell some of the allowances that they have received. Each budget source must designate an account representative to handle all its allowance transactions. The USEPA, in a central national system, will maintain allowance accounts and record transfer of allowances among accounts.

The ability of sources to transfer allowances will serve to minimize the costs of reducing NO_x emissions from budget units to comply with the overall NO_x budget. In particular, the NO_x emissions of budget units that may be most economically controlled will be targeted by sources for further control of emissions. This will result in a surplus of NO_x allowances from those units that can be transferred to other units at which it is more difficult to control NO_x emissions. Experience with reduction of sulfur dioxide emissions under the federal Acid Rain program has shown that this type of trading program not only achieves regional emission reductions in a more cost-effective manner but also results in greater overall reductions than application of traditional emission standards to individual emission units.

The USEPA developed the plan for the NO_x Trading Program with assistance from affected states. Illinois' rules for the NO_x Trading Program are located at 35 IAC Part 217, Subpart U and W, for non-EGUs and EGUs, respectively. These rules have been approved by the USEPA. These rules provide for interstate trading of NO_x allowances, as mandated by Section 9.9 of the Act. Accordingly, these rules refer to and rely upon federal rules at 40 CFR Part 96, which have been developed by USEPA for certain aspects of the NO_x Trading Program, and which an individual state must follow to allow for interstate trading of allowances.

Note: This narrative description of the NO_x Trading Program is for informational purposes only and is not enforceable.

6.2 Applicability

- a. The following emission units are budget units for purposes of Illinois' NO_x Trading Program. Accordingly, this source is a budget source and the Permittee is the owner or operator of a budget source and budget units. In this section of this permit, these emission units are addressed as budget units.

Coal-Fired Boiler #1
Coal-Fired Boiler #2
Boiler #25

- b. This Permit does not provide "low-emitter status" for the above emission units pursuant to 35 IAC 217.472.

6.3 General Provisions of the NO_x Trading Program

- a. This source and the budget units at this source shall comply with all applicable requirements of Illinois' NO_x Trading Program, i.e., 35 IAC Part 217, Subpart U, and 40 CFR Part 96 (excluding 40 CFR 96.4(b) and 96.55(c), and excluding 40 CFR 96, Subparts C, E and I), pursuant to 35 IAC 217.456(a) and 217.456(f)(2).
- b. Any provision of the NO_x Trading Program that applies to a budget source (including any provision applicable to the account representative of a budget source) shall also apply to the owner and operator of such budget sources and to the owner and operator of each budget unit at the source, pursuant to 35 IAC 217.456(f)(3).
- c. Any provision of the NO_x Trading Program that applies to a budget EGU (including any provision applicable to the account representative of a budget unit) shall also apply to the owner and operator of such budget unit. Except with regard to requirements applicable to budget units with a common stack under 40 CFR 96, Subpart H, the owner and operator and the account representative of one budget unit shall not be liable for any violation by any other budget unit of which they are not an owner or operator or the account representative, pursuant to 35 IAC 217.456(f)(4).

6.4 Requirements for NO_x Allowances

- a. Beginning in 2004, by November 30 of each year, the allowance transfer deadline, the account representative of each budget unit at this source must hold allowances available for compliance deductions under 40 CFR 96.54 in the budget unit's compliance account or the source's overdraft account in an amount that shall not be less than the budget unit's total NO_x emissions for the preceding control period (rounded to the nearest whole ton), as determined in accordance with applicable monitoring requirements, plus any number of allowances necessary to account for actual utilization (e.g., for testing, start-up, malfunction, and shut down) under 40 CFR 96.42(e) for the control period, pursuant to 35 IAC 217.456(d)(1). For purposes of this requirement, an allowance may not be utilized for a control period in a year prior to the year for which the allowance is allocated, pursuant to 35 IAC 217.456(d)(4).
- b. The account representative of a budget unit that has excess emissions in any control period, i.e., NO_x emissions in excess of the number of NO_x allowances held

as provided above, shall surrender allowances as required for deduction under 40 CFR 96.54(d)(1), pursuant to 35 IAC 217.456(f)(5). In addition, the owner or operator of a budget unit that has excess emissions shall pay any fine, penalty, or assessment, or comply with any other remedy imposed under 40 CFR 96.54(d)(3) and the Act, pursuant to 35 IAC 217.456(f)(6). Each ton of NO_x emitted in excess of the number of NO_x allowances held as provided above for each budget unit for each control period shall constitute a separate violation of 35 IAC Part 217 and the Act, pursuant to 35 IAC 217.456(d)(3).

- c. An allowance allocated by the Illinois EPA or USEPA under the NO_x Trading Program is a limited authorization to emit one ton of NO_x in accordance with the NO_x Trading Program. As explained by 35 IAC 217.456(d)(5), no provisions of the NO_x Trading Program, the budget permit application, the budget permit, or a retired unit exemption under 40 CFR 96.5 and no provision of law shall be construed to limit the authority of the United States or the State of Illinois to terminate or limit this authorization. As further explained by 35 IAC 217.456(d)(6), an allowance allocated by the Illinois EPA or USEPA under the NO_x Trading Program does not constitute a property right. As provided by 35 IAC 217.456(d)(2), allowances shall be held in, deducted from, or transferred among allowances accounts in accordance with 35 IAC Part 217, Subpart U, and 40 CFR 96, Subparts F and G.

6.5 Monitoring Requirements for Budget Units

- a. The Permittee shall comply with the monitoring requirements of 40 CFR Part 96, Subpart H, for the budget unit and the compliance of the budget unit with the emission limitation under 6.4(a) shall be determined by the emission measurements recorded and reported in accordance with 40 CFR 96, Subpart H, pursuant to 35 IAC 217.456(c)(1) and (c)(2).
- b. The account representative for the source and the budget unit at the source shall comply with those sections of the monitoring requirements of 40 CFR 96, Subpart H, applicable to an account representative, pursuant to 35 IAC 217.456(c)(1).

Note: Pursuant to 40 CFR 96.70(b), existing budget units are to begin complying with applicable monitoring requirements of 40 CFR Part 96 at least one year in advance of the start of the first control period governed by the NO_x Trading Program.

6.6 Recordkeeping Requirements for Budget Units

Unless otherwise provided below, the Permittee shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This 5-year period may be extended for cause at any time prior to the end of the 5 years, in writing by the Illinois EPA or the USEPA.

- a. The account certificate of representation of the account representative for the source and each budget unit at the source and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with 40 CFR 96.13, as provided by 35 IAC 217.456(e) (1) (A). These certificates and documents must be retained on site at the source for at least 5-years after they are superseded because of the submission of a new account certificate of representation changing the account representative.
- b. All emissions monitoring information, in accordance with 40 CFR 96, Subpart H, (provided that to the extent that 40 CFR 96, Subpart H, provides for a 3-year period for retaining records, the 3-year period shall apply), pursuant to 35 IAC 217.456(e) (1) (B).
- c. Copies of all reports, compliance certifications, and other submissions and all records made or required under the NO_x Trading Program or documents necessary to demonstrate compliance with requirements of the NO_x Trading Program, pursuant to 35 IAC 217.456(e) (1) (C).
- d. Copies of all documents used to complete a budget permit application and any other submission under the NO_x Trading Program, pursuant to 35 IAC 217.456(e) (1) (D).

6.7 Reporting Requirements for Budget Units

- a. The account representative for this source and each budget unit at this source shall submit to the Illinois EPA and USEPA the reports and compliance certifications required under the NO_x Trading Program, including those under 40 CFR 96, Subparts D and H, and 35 IAC 217.474, pursuant to 35 IAC 217.456(e) (2).
- b. Notwithstanding the provisions for CAAPP permits, these submittals need only be signed by the designated representative, who may serve in place of the responsible official for this purpose, as provided by Section 39.5(1) of the Act, and submittals to the Illinois EPA need only be made to the Illinois EPA, Air Compliance Unit.

6.8 Allocation of NO_x Allowances to Budget Units

- a. As the budget units identified in Condition 6.2(a) are "existing" units listed in 35 IAC Part 217, Appendix E, these units are entitled to NO_x allowances as specified by Appendix E, subject to transfers of allowances from the source made in accordance with 35 IAC 217.462(b). (The portion of Appendix E that applies to the Permittee is provided in Condition 6.12.) The number of NO_x allowances actually allocated for these budget units shall be the number of NO_x allowances allocated by the Illinois EPA in accordance with 35 IAC 217.466(a) and issued by USEPA, which may reflect adjustments to the overall allocations to budget units as provided for by 35 IAC 217.460 and 217.462(c).
- b. To the extent that NO_x allowances remain in the NSSA after any allocation for new budget units, the Permittee is also entitled to a pro-rata share of such remaining allowances as provided by 35 IAC 217.466(d).

6.9 Eligibility to Obtain NO_x Allowances from the New Source Set-Aside (NSSA)

The Permittee is not eligible to obtain NO_x allowances from the NSSA for the budget units identified in Condition 6.2(a), as provided by 35 IAC 217.468, because the units are "existing" budget units.

6.10 Eligibility for Early Reduction Credits (ERC)

The Permittee is not eligible to request NO_x allowances for the budget units identified in Condition 6.2(a) for any early reductions in NO_x emissions prior to the 2004 control period, as provided by 35 IAC 217.470, because these units are not equipped with continuous emission monitoring systems for NO_x.

6.11 Budget Permit Required by the NO_x Trading Program

- a. For this source, this segment of the CAAPP Permit, i.e., Section 6, is the Budget Permit required by the NO_x Trading Program and is intended to contain federally enforceable conditions addressing all applicable NO_x Trading Program requirements. This Budget Permit shall be treated as a complete and segregable portion of the source's permit, as provided by 35 IAC 217.458(a)(2).
- b. The Permittee and any other owner or operator of this source and each budget unit at the source shall operate the budget units in compliance with this Budget Permit, pursuant to 35 IAC 217.456(b)(2).
- c. No provision of this Budget Permit or the associated application shall be construed as exempting or excluding the Permittee, or other owner or operator and, to the extent applicable, the account representative of a budget

source or budget unit from compliance with any other regulation or requirement promulgated under the CAA, the Act, the approved State Implementation Plan, or other federally enforceable permit, pursuant to 35 IAC 217.456(g).

- d. Upon recordation by USEPA under 40 CFR 96, Subpart F or G, every allocation, transfer, or deduction of an allowance to or from the budget units' compliance accounts or to or from the source's general or overdraft account is deemed to amend automatically and become part of this budget permit, pursuant to 35 IAC 217.456(d)(7). This automatic amendment of this budget permit shall be deemed an operation of law and will not require any further review.
- e. No revision of this Budget Permit shall excuse any violation of the requirements of the NO_x Trading Program that occurs prior to the date that the revision to this permit takes effect, pursuant to 35 IAC 217.456(f)(1).
- f. The Permittee, or other owner or operator of the source, shall reapply for a Budget Permit for the source as required by 35 IAC Part 217, Subpart U and Section 39.5 of the Act. For purposes of the NO_x Trading Program, the application shall contain the information specified by 35 IAC 217.458(b)(2).

6.12 References

35 IAC Part 217 Appendix E - (provisions applicable to the Permittee)

Company I.D. No./Name	Unit Designation	Unit Description	Budget Allocation	Budget Allocation Less 3% NSSA
115015ABX A. E. Staley Manufacturing	85070061299	Coal-Fired Boiler #1	176	171
115015ABX A. E. Staley Manufacturing	85070061299	Coal-Fired Boiler #2	175	170
115015ABX A. E. Staley Manufacturing	73020084129	Boiler #25	125	121
Company's Total Allocation			476	462

7.0 UNIT SPECIFIC CONDITIONS

7.1 Elevator Area

7.1.1 Description

The elevator area receives, stores and transfers shelled corn. The corn is delivered to the plant by either truck or railcar. The elevator area is equipped with four receiving stations, two for each form of delivery. After the corn is unloaded, it is transferred to storage silos by the use conveyors and bucket elevators. Upon plant demand, the corn is conveyed to the wet mill and cleaned for processing. Total annual grain throughput exceeds 2.5 million bushels per year.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 1	Elevator Area	Elevator D Truck Dump (I.D. 25-31)	Dust Collector L-5
		Grain Belt Conveyors (I.D. 25-35)	Dust Collector L-9
		Area A Grain Belt Conveyors (I.D. 25-37)	Dust Collector L-11
		Elevator D Railcar Dump (I.D. 25-38)	Dust Collector L-4
		Chaff System Receiver (I.D. 25-39)	Dust Collector L-8
		Reclaim System Conveyors (I.D. 25-40)	Dust Collector L-7
		Gallery System Conveyors (I.D. 25-41)	Dust Collector L-6
		House Vacuum System (I.D. 25-42)	Dust Collector VAL-1
		Elevator D Storage Silos (I.D. 25-43)	None
		Elevator C Truck Dump (I.D. 28-23)	Dust Collector L-3031
		Elevator C Railcar Dump (I.D. 28-29)	Dust Collector L-3033

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected grain handling unit" for the purpose of these unit specific conditions is a unit described in Conditions 7.1.1 and 7.1.2 above.
- b. Each affected grain handling unit is subject to 35 IAC 212.461(b). Requirements of these regulations are discussed further.

c. Alternate Control of Particulate Matter Emissions.
[212.461(g)]:

- i. Grain-handling or grain-drying operations, which were in numerical compliance with Section 212.322 of this Part, as of April 14, 1972, and continue to be in compliance with Section 212.322 of this Part need not comply with the provisions under this Subpart, except the housekeeping practices in this subsection and subsection (b) of this Section.
- ii. Grain-handling or grain-drying operations, which were not in numerical compliance with Section 212.322 of this Part, as of April 14, 1972, but which came into compliance with Section 212.321 of this Part prior to April 14, 1972, and continue to be in compliance with Section 212.321 of this Part need not comply with the provisions under this Subpart, except the housekeeping practices in this subsection and in subsection (b) of this Section.
- iii. Proof of compliance with said rule shall be made by stack sampling and/or material balance results obtained from actual testing of the subject emission unit or process and be submitted at the time of an application for, or renewal of, an operating permit.

7.1.4 Non-Applicability of Regulations of Concern

- a. 35 IAC 462 shall not apply to affected grain handling units, pursuant to Alternative Control of Particulate Matter Emissions established in 35 IAC 212.461(g).
- b. Affected grain handling units are not subject to 40 CFR Part 60, Subpart DD because all affected units had been constructed or modified prior to August 3, 1978.

7.1.5 Operating Requirements and Work Practices

The affected grain handling units are subject to the following requirements of 35 IAC 212.461(b) - Housekeeping practices:

- a. Air pollution control device shall be checked daily and cleaned as necessary to insure proper operation.
- b. Cleaning and Maintenance:

- i. Floors shall be kept swept and cleaned from boot pit to cupola floor. Roof or bin decks and other exposed flat surfaces shall be kept clean of grain and dust that would tend to rot or become airborne.
 - ii. Cleaning shall be handled in such a manner as not to permit dust to escape to the atmosphere.
 - iii. The yard and surrounding open area, including but not limited to ditches and curbs, shall be cleaned to prevent the accumulation of rotting grain.
- c. Dump Pit:
 - i. Aspiration equipment shall be maintained and operated.
 - ii. Dust control devices shall be maintained and operated.
- d. Head House. The head house shall be maintained in such a fashion that visible quantities of dust or dirt are not allowed to escape to the atmosphere.
- e. Property. The yard and driveway of any source shall be asphalted, oiled or equivalently treated to control dust.
- f. Housekeeping Check List. Housekeeping check lists to be developed by the Agency shall be completed by the manager and maintained on the premises for inspection by Agency personnel.

7.1.6 Emission Limitations

In addition to Condition 5.2.2, an affected grain handling unit is subject to the following:

Total emissions and operation of affected grain handling units (#25-35; #25-37; #25-39; #25-40; #25-41; #28-23) shall not exceed the following limits:

PM ₁₀ Emissions (lb/hr)	PM ₁₀ Emissions (Ton/yr)
6.93	19.3

These limitations were established in Operating Permit 86040052. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not

constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

None

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected grain handling units to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total monthly and annual grain throughput in tons/month and tons/year.
- b. Records of hours of operation, hr/yr.
- c. Maintenance and repair log for air pollution control equipment.
- d. PM/PM₁₀ emissions calculated in accordance with Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limitations as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the emission limitations In Condition 7.1.6, as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the air pollution control devices as required by this section and the work-practices inherent in operation of the affected grain handling units.
- b. To calculate emissions of PM_{10} the following equation shall be used:

$$PM \text{ Emissions}^* = (\text{Air Flow, cfm}) \times (\text{Estimated Dust Loading, gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [1 - (\text{Control Device Efficiency } \%) / 100].$$

- * As specified by the manufacturer or vendor of the filter, or air testing of the actual equipment, or testing of similar equipment at this or other facilities, or based on vendor or manufacturer outlet concentration guarantees or predicted outlet emission performance, or based on the standard EPA emission factors such as AP-42. If compliance testing has been conducted to determine mass emission rates, then the test data may be used in lieu of the above. Vendor outlet concentration guarantees and predicted performance, or experience with similar equipment, may be used in place the equation above.

7.2 Wet Milling Area

7.2.1 Description

Shelled corn, conveyed from storage silos, is cleaned. Cleaned corn is then transferred into steeping tanks where it is allowed to soak in steepwater (a mixture of water and sulfurous acid to soften the corn kernel for milling). The steeped corn is transferred to the wet mill house where a rough first pass grind releases the germs. The germs are then separated from the mixture by centrifugal force and conveyed to the germ system.

The corn germs, which are separated in the milling step, are dewatered using screens. The dewatered germs are then dried in a two-pass steam tube rotary dryer system. The dried germs are cooled and then conveyed and loaded into trucks. The gluten slurry, which is separated in the wet milling step, is dewatered using rotary vacuum filters. The gluten cake is dried in flash dryer, milled and conveyed to storage bins. The gluten meal is then loaded out in railcars and used for animal feeds. The fiber and steepwater are mixed and dried in a series of rotary steam tube dryers and then cooled in a rotary cooler. Feed is pelletized and loaded out in railcars for use as animal feed.

7.2.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description/Date of Construction	Emission Control Equipment
Group 2	Wet Corn Milling	Elevator "A" Dust Collection System (I.D. 3-10)	Baghouse
	Buildings: #3, #4, #6	Steep Tanks Aspiration Vent (I.D. 4-01)	None
		Jet Sulfur Burner (I.D. 6-04)	Absorption Tower
		System #1 and #2 Aspiration (I.D. 6-05)	None
		System #3 Aspiration (I.D. 6-06)	None
		Merco Aspiration (I.D. 6-07)	None
		System #5 Aspiration (I.D. 6-08)	None
		Elevator "A" Pneumatic Conveying (I.D. 154-07)	Baghouse
		Six Tails Tank Aspiration (I.D. 9-31)	None
		Corn Belt Transfer Point (I.D. 3-11)	Baghouse

Emission Unit	Equipment	Description/Date of Construction	Emission Control Equipment
	Wet Corn Milling Buildings: #11, #75	Primary Germ Dryers (1st Mode of Operation; I.D. 11-12, 13, 14(A))	Cyclone
		Primary Germ Dryers (2nd Mode of Operation; I.D. 11-12, 13, 14(B))	Cyclone and Scrubber
		Filtrate Tank and Dewatering Screens (I.D. 11-16, 17, 18, 19)	Scrubber
		Gluten Transport System (I.D. 75-02)	Cyclone and Baghouse
		Gluten Milling System (I.D. 75-06)	Baghouse
		Germ Cooler (I.D. 11-20)	None
		Germ Cooler Feed Conveyor (I.D. 11-21)	Cyclone
		Germ Cooler Discharge Conveyor (I.D. 11-22)	Cyclone
		Pellet Loadout (I.D. 75-23)	Baghouse
		Gluten Meal Loadout (I.D. 75 - 24)	Baghouse
	Wet Corn Milling Buildings: #14, #153, #154, #155	Boilout Material Storage Tank (I.D. 154-09)	None
		Fiber Filtrate Tank (I.D. 155-01)	None
		Light Steepwater Tank (I.D. 154-08)	None
		Hammermill Collection Conveyor (I.D. 154-06)	Scrubber
		Four Rotary Steam Dryers (I.D. 154-01, 02, 03 & 04)	Scrubbers & Thermal Oxidizer
		Rotary Cooler (I.D. 154-05)	Cyclone & Scrubber
		Gluten Meal Dryer (I.D. 14-1)	Scrubber
		Gluten Vacuum Filter (I.D. 14-7)	None
		Gluten Vacuum Filters (9) (I.D. 14-06)	None
		Gluten Vacuum Pumps (3) (I.D. 14-08)	None
		Protein Recovery Filter (I.D. 14-09)	None
		Pellet Coolers #1-#4 (I.D. 153-03, 04, 05 & 06)	Cyclones

Emission Unit	Equipment	Description/Date of Construction	Emission Control Equipment
		Feed Sifter System (I.D. 153-01)	Cyclone & Baghouse
		Protein Recovery Filter (I.D. 14-09)	None

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected wet corn milling unit" for the purpose of these unit specific conditions is a unit described in Conditions 7.2.1 and 7.2.2 above.
- b. Each affected wet corn milling unit is subject to 35 IAC 212.321(b) (1), which provide that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection I of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

- c. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit unless no odor nuisance exists and non-photochemically reactive materials are used [35 IAC 215.301].

7.2.4 Non-Applicability of Regulations of Concern

None

7.2.5 Operational and Production Limits and Work Practices

- a. The Permittee shall institute an Inspection and Logging Procedure for all dry control devices (e.g. cyclones and baghouses). This Inspection and Logging Procedure shall, as a minimum, include the following on a regularly scheduled basis:
 - i. Check to insure that the dust is being removed from the system;
 - ii. Inspection for proper cleaning, functioning, and cycling;

- iii. Inspection of the control devices, fans, and all moving parts for material buildup, wear, and corrosion; and
 - iv. Logging of broken bags by location in order to identify installation or equipment problems.
- b. The Permittee shall institute an Inspection and Logging Procedure for all wet control devices (e.g. scrubber). This Inspection and Logging Procedure shall as a minimum, include the following on a regularly scheduled basis:
- i. Inspection (directly or indirectly) of the control device, fans, and all moving parts for material buildup, wear, and corrosion; and
 - ii. Inspection of the device for the continuous measurement of the pressure loss of the gas stream through the wet control device and for the continuous measurement of the liquid flow rate through the wet control device for plugging and for proper operation.
- c. Operation of equipment shall not exceed the following limitation:
- i. Feed Dryers

Item of Equipment	Input Rate		
	(T/Hr)	(Million T/Yr)	Material
14-01 Gluten Meal Dryer	135	1.183	Wet Gluten Meal and Dry Recycle
154-01, 154-02, 154-03, 154-04 Feed Dryers 1-4	160	1.401	Wet Gluten Feed
Rotary Cooler (154-05)	60.0	0.52	Hot Gluten Feed
Hammermill Collection Conveyor (154-06)	60.0	0.52	Gluten Feed

- ii. Germ Drying System (I.D. 11-7, 11-12 to 17, 11-16 to 19)

- A. Dried germ production from equipment shall not exceed the following limitations:

<u>Item of Equipment</u>	<u>Dried Germ Production Rate</u>	
	<u>(Tons/Month)</u>	<u>(Tons/Year)</u>
Germ Drying System	14,500	171,127

- B. The germ dryer scrubber system shall be in operation at all times during germ drying except during incidents of equipment malfunction, breakdown, and/or routine maintenance such that total scrubber bypass time does not exceed 5.0% of total operating time per year without bypass mode.
- C. Operation of the germ dryer scrubber in the bypass mode shall not exceed 438 hours per year.

iii. Germ Cooler System (I.D. 11-20, 21, 22)

Operation of the germ cooler system shall not exceed:

Process Rate
(lb/hr)
39,070

iv. Gluten Milling System (I.D. 75-06)

Operation of the gluten milling system shall not exceed:

Process Rate
(T/hr)
15.0

- d. The Permittee shall operate, maintain, and repair affected emission units identified in Condition 7.2.5(c) and their respective control systems in a manner assuring compliance with applicable emission standards.
- e. Operating Procedures for Control System: Written operating procedures shall be developed and maintained for affected emission units describing normal air pollution control equipment operation including establishment of target levels for the following operating parameters:
 - i. Combustion zone temperature operating range for the Gluten Meal Dryer Furnace;
 - ii. Scrubbant recirculation flow range for the Gluten Meal Flash Dryer scrubber; Feed Dryer Units scrubbers (2), Feed Cooler scrubber and Hammermill Collection Conveyor scrubber;

- iii. Pressure drop operating range for the Gluten Meal Flash Dryer scrubber, Feed Dryers Units scrubbers (2); and
- iv. pH operating range for the Gluten Meal Dryer scrubber and Feed Dryer Units scrubbers (2).

Such procedures shall include inspection and maintenance practices and may incorporate manufacturers recommended operational instructions.

- f. Inspections: External visual inspections of affected emission units and associated control equipment shall be conducted on at least a weekly basis.
- g. Repairs: Prompt repairs of affected emission units and associated control equipment shall be made upon identification of need either as a consequence of formal inspections or other observations in conformance with good air pollution control practice.
- h. Records: Records of inspection, maintenance, and repair activities for affected emission units and associated control equipment shall be kept on site and shall include as a minimum:
 - i. Date of inspection, maintenance, and repair activities.
 - ii. Description of maintenance or repair activity if not routine preventative maintenance.
 - iii. Probable cause for requiring maintenance or
 - iv. repair if not routine or preventative.
- i. Conditions 7.2.5(e) through (h) are applied for emission units identified in Condition 7.2.5(c) (i).

7.2.6 Emission Limitations

In addition to Condition 5.2.2, an affected wet corn milling unit is subject to the following:

- a. Jet Sulfur Burner (I.D. 6-04)

Emissions and operation shall not exceed the following limits:

Vent	SO ₂ Emissions	
	(Lb/hr)	(T/yr)
Absorption Tower (Total)	4.9	21.2

These operating and emission limits established in the Construction Permit 89110022. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

b. New Feedhouse Equipment

Emissions shall not exceed the limits established in Attachment 1.

These limitations were established in Construction Permit 95060239. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

c. Germ Drying System (I.D. 11-12, 13, 14, 16, 17, 18, and 19)

Emissions of Sulfur Dioxide, Volatile Organic Material, and Particulate Matter from equipment shall not exceed the following limits:

i. Germ Dryers

<u>Item of Equipment</u>	<u>Status</u>
--------------------------	---------------

Germ Dryers	With Scrubber Without Scrubber
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<u>SO₂ Emissions</u>		<u>VOM Emissions</u>		<u>PM Emissions</u>	
<u>(Lbs/Hr)</u>	<u>(T/Yr)</u>	<u>(Lbs/Hr)</u>	<u>(T/Yr)</u>	<u>(Lbs/Hr)</u>	<u>(T/Yr)</u>
34.9	145.0	9.13	37.99	3.43	14.30
52.1	<u>11.4</u>	9.13	<u>2.00</u>	10.02	<u>2.19</u>
Totals	156.4		39.99		16.49

These limitations were established in Joint Construction and Operating Permit 95070130. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not

constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1]. By installation of a heat exchange system, potential (allowable) emissions of SO₂ from existing Germ Drying System being decreased from 228 t/yr to 156.4 t/yr.

ii. Germ Dewatering

<u>VOM Emissions</u>		<u>SO₂ Emissions</u>	
<u>(Lb/Hour)</u>	<u>(Ton/Year)</u>	<u>(Lb/Hour)</u>	<u>(Ton/Year)</u>
0.80	3.50	1.79	7.86

These limitations were established in Joint Construction and Operating Permit 95070130. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

d. Gluten Transport Systems (I.D. 75-02) and Pellet Coolers (I.D. 153-03, 153-04, 153-05, 153-06):

	Exhaust Flow Rate	Concentration	PM Emissions	
Equipment	(scfm)	(Gr/scf)	(Lb/Hr)	(T/Yr)
Gluten Transport System (I.D. 75-02)	15,000	0.01	1.29	5.63
4 Pellet Coolers (Each) (I.D. 153-03, 04, 05, 06)	20,000	0.01	1.51	6.61

These limitations were established in Construction Permit 95080143. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

e. Aspiration Systems (Buildings 4 & 6):

Equipment	SO ₂ Emissions	
	(Lb/hr)	(T/yr)
Systems #1 and #2 (I.D. 6-05)	19.03	83.37
System #3 (I.D. 6-06)	2.39	10.48
Merco System (I.D. 6-07)	8.42	36.90
System #5 (I.D. 6-8)	12.01	52.62
Steep Tanks (I.D.4-01)	8.63	37.80
Sixth Tails Tank (I.D. 9-31)	1.26	5.50

Equipment	PM Emissions	
Steep Tanks (I.D.4-01)	1.00	3.77

These limitations were established in Operating Permit 95030106. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

f. Germ Cooler System (I.D. 11-20, 21, 22)

PM Emissions	
(Lb/hr)	(T/yr)
1.3	5.7

These limitations were established in Construction Permit 97040097. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

g. Feed Sifter System (153-01)

Emissions of particulate matter from the feed sifter controlled by a cyclone and a baghouse shall not exceed 0.2 lb/hr and 0.88 ton/yr.

These limitations were established in Construction Permit 97120058. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not

constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

h. Gluten Meal Dryer (I.D. 14-01)

- i. Except as allowed by the alternative operating scenario address by Condition 7.2.6(h) (ii), the Feed Dryer Units 1-4 and the Feed Cooler shall vent through the gluten meal dryer furnace, through the gluten meal dryer and discharge through the gluten stack. Emissions of these units that discharge through the gluten stack shall not exceed the following limits:

Emission Unit	PM ₁₀ (Lb/Hr)	SO ₂ (Lb/Hr)	NO _x (Lb/Hr)	CO (Lb/Hr)	VOM (Lb/Hr)
Total Gluten Stack	17.6	12.1	32	9.6	71.7
Total Feed Stack	0	0	0	0	0

- ii. For up to 864 hours in any 12-month period of, the Feed Dryer Units 1-4 and feed cooler the feed may discharge directly to the atmosphere through the feed stack. The gluten meal flash dryer scrubber shall vent to the gluten stack if operational. Emissions shall not exceed the following limits during this alternative operating scenario:

Emission Unit	PM ₁₀ (Lb/Hr)	SO ₂ (Lb/Hr)	NO _x (Lb/Hr)	CO (Lb/Hr)	VOM (Lb/Hr)
Total Gluten Stack	17.5	33.6*	32	9.6	170.8*
Total Feed Stack	17.5	---	---	---	---

* Emissions combined for Gluten and Feed Stacks

- iii. In no event shall combined emissions exceed the following limits:

Emission Unit	PM ₁₀ (T/Yr)	SO ₂ (T/Yr)	NO _x (T/Yr)	CO (T/Yr)	VOM (T/Yr)
Total Gluten and Feed Stack	84.1	56.7	140	42	327.4

These limitations (Condition 7.2.6(h)) were established in Joint Construction and Operating Permit 00110048. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

i. Elevator "A" Dust Collection System (I.D. 3-10)

PM Emissions shall not exceed the following limits:
0.86 lb/hr and 3.77 ton/yr.

These limitations were established in Joint Construction and Operating Permit 91030017. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

j. Elevator "A" Pneumatic Conveyor (I.D. 154-07)

PM Emissions shall not exceed the following limits:
0.24 lb/hr and 1.05 ton/yr.

These limitations were established in Joint Construction and Operating Permit 91030016. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

k. Corn Belt Transfer Point (I.D. 3-11)

PM Emissions shall not exceed the following limits:
0.3 lb/hr and 1.2 ton/yr.

These limitations were established in Construction Permit 97060126. These limits ensure that the construction and/or

modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

1. Gluten Milling System (I.D. 75-06)

PM Emissions shall not exceed the following limits:
0.12 lb/hr and 0.5 ton/yr.

These limitations were established in Construction Permit 92110007. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

m. Nine Gluten Vacuum Filters (I.D. 14-06)

Emissions (per each unit) shall not exceed the following limits:

Pollutant	Lb/hr	T/yr
PM	0.05	0.21
SO ₂	1.01	4.43

These limitations were established in Joint Construction and Operating Permit 95060108. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

n. Protein Recovery Filter (I.D. 14-09)

Emissions shall not exceed the following limits:

Flow Rate, scfm	Pollutant	Emissions	
		Lb/hr	T/yr
2,640	VOM	0.95	4.1
	SO ₂	1.32	5.8

These limitations were established in Joint Construction and Operating Permit 03030065. These limits ensure that the construction and/or modification addressed in the aforementioned Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- o. Compliance with annual limits for all emission units described in Condition 7.2.6 shall be determined based on the 12 months of data.

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

- a. The Permittee shall install, maintain and operate continuous monitors on the Gluten Meal Dryer scrubber that supply continuous readings and store average hourly values for the following parameters:
 - i. Pressure drop
 - ii. Scrubbant recirculation rate (gallons/minute)
 - iii. Recirculated Scrubbant pH
- b. The Permittee shall install, maintain and operate continuous monitors on the Gluten Meal Dryer furnace that supply continuous readings and store average hourly values for the following parameters:
 - i. Combustion zone temperature (degrees F)
 - ii. Feed stack damper position (% open)
 - iii. Gas flow rate to furnace from feed dryers and feed cooler (acfm)
 - iv. An equivalent alternative parameter may be accepted by the Illinois EPA in lieu of stack gas flow rate stated in Condition 7.2.8(b)(iii) provided a correlation between the alternative parameter and flow rate has been established (i.e. damper position on furnace inlet duct and on furnace quench air duct versus actual flow rate measurements)

- c. The Permittee shall install and maintain a continuous monitor on the germ scrubber system for liquid flow, and scrubber pressure drop. Water flow may be measured directly or indirectly (e.g. pump speed or amperage drawn).
- d. The Permittee shall install and maintain a continuous monitor on the RSTD scrubber system for liquid flow, scrubbant pH, and scrubber pressure drop. The Permittee shall install and maintain a continuous monitor on the feed cooler scrubber and hammermill collection conveyor scrubber system for liquid flow. Water flow may be measured directly or indirectly (e.g. pump speed or amperage drawn)

7.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected wet corn milling unit to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain the following records for the Gluten Meal Dryer. This data shall be recorded whenever a new measurement is taken or an item is changed except as specified below:
 - i. Dryer throughput based on the daily grind rate, daily natural gas firing rate (cfm or mmBtu/hr) and daily average meal product moisture levels, recorded at least once per shift;
 - ii. Desired flow rate and pH values of the control system recycled scrubbant.
- b. The Permittee shall maintain the following records for the Feed Dryers, Feed Cooler and Hammermill Conveyor. This data shall be recorded whenever a new measurement is taken or an item is changed except as specified below:
 - i. Dryers throughput based on the daily grind rate and feed moisture levels (dryer feed and production % moisture) recorded at least once per shift;
 - ii. Desired flow rate and pH values of the feed dryer recycled scrubbant;
 - iii. Desired flow rate of the feed cooler recycled scrubbant; and

- iv. Desired flow rate of the hammermill conveyor recycled scrubbant.
- c. The Permittee shall maintain records of the following operating parameters for the Gluten Meal Dryer. These parameters shall be manually recorded at least once every hour, if automatic measurement and recording device(s) are not in service for more than two hours.
 - i. Pressure drop across the scrubber
 - ii. Scrubbant recirculation rate (gallons/minute)
 - iii. Recirculated Scrubbant pH
 - iv. Combustion zone temperature (deg F)
 - v. Gas flow rate to the furnace from feed dryers and feed cooler
- d. The Permittee shall maintain records of the following operating parameters for the Feed Dryers. These parameters shall be manually recorded at least once every hour, if automatic measurement and recording device(s) are not in service for more than two hours.
 - i. Pressure drop across each scrubber
 - iii. Scrubbant recirculation rate for each scrubber (gallons/minute)
 - iii. Recirculated Scrubbant pH for each scrubber
 - iv. Feed stack damper position (% open)
- e. The Permittee shall maintain records of the following operating parameters for the feed cooler and hammermill conveyors. These parameters shall be manually recorded at least once every hour, if automatic measurement and recording device(s) are not in service for more than two hours.
 - i. Scrubbant recirculation rate for each scrubber (gallons/minute or pump amps).
- f. The Permittee may substitute, in lieu of scrubbant recirculation pump flow rate (gallons/hr), monitoring and recording of scrubbant recirculation pump amps to comply with the requirements of this Section.
- g. The Permittee shall keep records of all emission measurements and readings.

- h. The Permittee shall maintain records for any period during which the exhaust from the Feed Dryers and Feed Cooler bypasses the Gluten Meal Dryer (Alternative Operating Scenario).
- i. The Permittee shall maintain records for any period during which an affected emission unit was in operation when its air pollution control equipment was not in operation or was not operating properly.
 - i. These records shall include each period of time when an operating parameter of a control system, as recorded above, deviated outside the level set as good air pollution control practice (date, duration, and description of the incident).
 - ii. These records shall include the cause for pollution control equipment not operating properly or being out of normal service, for incidents when control equipment failed to operate properly and shall identify the corrective actions that were taken, the repairs that were made, and the steps that were taken to prevent any such reoccurrence.
 - iii. These records shall also identify any such periods during which an emission unit exceeded the requirements of this permit, including applicable emission limits. This record shall include the cause for noncompliance, if known and the corrective action(s) and preventative measures taken to prevent any such reoccurrence if any.
- j. The Permittee shall keep emission records for the Gluten Meal Dryer, Feed Dryers, Feed Cooler, and Hammermill Conveyer as follows:
 - i. PM emission rate, in lb/hr, determined for each configuration and condition as described in Condition 7.2.6 for the dryers and cooler, based on test data and other engineering estimates with supporting explanations and calculations.
 - ii. Number of hours operated at each emission rate identified above on a monthly basis, with explanation.
 - iii. Monthly emissions of PM, SO₂, VOM, NO_x, and CO determined as the summation of the product of the above records.
 - iv. Annual emissions of PM, SO₂, VOM, NO_x, and CO.

- k. Hours of germ dryer operation with scrubber on line (i.e. normal operation)
- l. Hours of germ dryer operation with scrubber off line (i.e. malfunction or breakdown)
- m. The Permittee shall maintain a "Scrubber Log" for the germ scrubber, which shall contain as a minimum the following items:
 - i. Date and time of scrubber bypass;
 - ii. Date and time of which normal operation resumed; and
 - iii. Reasons for scrubber bypass (i.e. cyclone maintenance)
- n. Records of monitored parameters as required by Condition 7.2.8(c)
- o. Total raw corn throughput, tons/mo and tons/yr;
- p. Amount of germ processed, tons/mo and tons/yr;
- q. Maintenance and repair log for air pollution control equipment; and
- r. Monthly and annual emissions calculated in accordance with compliance procedures established in Condition 7.2.12 along with the following records:
 - i. Concentration of air pollutant, ppm
 - ii. Exit gas flow rate, scfm
 - iii. Hours of operation of affected wet corn milling unit

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limitations as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a

description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the dust collectors as required by this section and the work-practices inherent in operation of the affected wet corn milling unit.
- b. To determine compliance with Condition 7.2.3 and 7.2.6, emissions of PM_{10} from the affected wet corn milling unit shall be calculated based on the following:

$PM \text{ Emissions}^* = (\text{Air Flow, cfm}) \times (\text{Estimated Dust Loading, gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [1 - (\text{Filter Efficiency } \%) / 100]$.

* As specified by the manufacturer or vendor of the filter, or air testing of the actual equipment, or testing of similar equipment at this or other facilities, or based on vendor or manufacturer outlet concentration guarantees or predicted outlet emission performance, or based on the standard EPA emission factors such as AP42. If compliance testing has been conducted to determine mass emission rates, then the test data may be used in lieu of the above. Vendor outlet concentration guarantees and predicted performance, or experience with similar equipment, may be used in place the equation above.

- c. For calculation of VOM and SO_2 emissions, the following equation shall be used:

$$E_r = \frac{(C_x * MW_x * Q * 60)}{(V * 10^6)}$$

Where:

E_r = Pollutant emission rate, lb/hr

C_x = Concentration of pollutant, ppm

MW_x = Molecular weight of pollutant, lb/lb-mole

Q = Exit gas flow rate, scfm

V = Volume occupied by 1 mole, 385.2 lb/ft³

For calculation annual VOM and SO₂ emissions, hourly emission rate (E_r) shall be multiplied by hours of operation of each affected wet corn milling unit.

7.3 Starch Area

7.3.1 Description

Starch slurry, separated during the wet milling process, is pumped to either the syrup refinery or the starch production area of the plant. The slurry is used to produce a variety of products, which include unmodified, acid-modified, ethylated, oxidized and food starches. Depending upon the desired starch product, the starch slurry is processed through a series of reaction vessels where chemical additives are introduced to the system. Upon the completion of reactions, the starch is conveyed to the starch dryers and dewatered. Once dried, the starch is pneumatically conveyed to storage bins and then transferred to one of the loadout stations. The starch loadout station's capabilities include loadout by railcar and truck to bags or tote packages.

7.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description/Date of Construction/Modification	Emission Control Equipment
Group 3	Starch Area Buildings #7, #7A, #26	Starch Modification and Ethylene Oxide Storage Tank (I.D. S-100A)	Scrubber
		Sodium Sulfate Storage Silo (I.D. 7 - 01)	Bag Filter
		Starch Bin 5 & 26 Bldg Railcar Loadout Station (I.D. 26 - 03)	Bag Filter
		No. 2 Flash Dryer Surge Hopper (I.D. 26 - 04)	Bag Filter
		No. 3 Flash Dryer Surge Hopper (I.D. 26 - 13)	Bag Filter
		No. 4 Flash Dryer Surge Hopper (I.D. 26 - 16)	Bag Filter
		Flash Dryers #1 - #5 (I.D. 26 - 08; 10; 12; 15; 18)	Cyclone & Scrubber for Each Unit #2, #3, #4, #5; Baghouse for Unit #1
		Starch Grinding #2 (I.D. 26 - 09)	Bag Filter
		Starch Bin #6 (I.D. 26 - 17)	Bag Filter

Emission Unit	Equipment	Description/Date of Construction/Modification	Emission Control Equipment
	Starch Area	Airwash Vacuum System (I.D. 34 - 01)	Bag Filter
	Building #34	Starch Railcar Loadout #1 and #2 (I.D. 34 - 02; 03)	Dust Collector Per Each Unit
		Starch Bag Packer #1 (I.D. 34 - 04)	Dust Collector
		Air Wash Dust Collector for Packer #2 (I.D. 34 - 05)	Dust Collector
		Starch Bag Packer #2 (I.D. 34-06)	Bin Vent Filter
		Starch Railcar Loadout #3 (I.D. 34 - 07)	Bag Filter
	Starch Area Buildings #37, #134	Starch Bins and Tote Packers #1 and #2 (I.D. 37 - 03 & 04)	Bag Filter
		Bin Farm Conditioning Air Bagfilter (I.D. 134-14)	Bag Filter
		Starch Blending Bin (I.D. 134 - 15)	Bin Vent Filter
		Flash Dryer #2 Bins (I.D. 134 - 16 & 17)	Bin Vent Filter
		Flash Dryer #4 Bins (I.D. 134 - 18, 19, 20, 21)	Bin Vent Filter
		Flash Dryer #3 Bins (I.D. 134 - 22, 23, 24)	Bin Vent Filter
		Flash Dryer #5 Bins (I.D. 134 - 32, 33, 34, 35)	Bin Vent Filter
		Starch Transfer System from Flash #5 Bins (I.D. 134-36)	Bag Filter
		Dry Starch Conveying to Starch Receivers (I.D. 134 - 25 & 26)	Bag Filter
		Starch Screening (I.D. 134 - 27)	Dust Collector
		Starch Truck Loadout (I.D. 134 - 28)	Dust Collector
		Starch Reslurry System (I.D. 134 - 29 & 30)	Bag Filter
		Surge Bin Starch Transfer and Blending (I.D. 134-40)	Baghouse
		Reactor Starch Transfer (I.D. 134-41)	Baghouse & Wet Scrubber

Emission Unit	Equipment	Description/Date of Construction/Modification	Emission Control Equipment
	Starch Area	Blend Bin Starch Transfer (I.D. 134-42)	Baghouse
	Buildings #37, #134 (Cont.)	Blend Bin Starch Blending (I.D. 134-43)	Baghouse
		Starch Thinning HCL Storage (I.D. 134-44, 45)	Limestone Canister & Scrubber
		Starch Thinning Blend Bins Receiver/Collector (I.D. 134-46)	Bag Filter

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected starch unit" for the purpose of these unit specific conditions is a unit described in Conditions 7.3.1 and 7.3.2 above.
- b. Each affected starch unit is subject either to 35 IAC 212.321(b) (1) or 35 IAC 212.322(b) (1), which provide that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].
 - ii. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].
- c. No person shall cause or allow any visible emissions of fugitive particulate matter from any process, including any material handling or storage activity beyond the property line of the emission source, pursuant to 35 Ill. Adm. Code 212.301.

7.3.4 Non-Applicability of Regulations of Concern

None

7.3.5 Operational and Production Limits and Work Practices

- a. The Permittee shall follow good operating practices for the associated air pollution control devices, including periodic inspection, routine maintenance and repair of defects.
- b. The Permittee shall operate, maintain, and replace the fabric filters in a manner that assures compliance with the conditions of this Section.
- c. The Permittee shall institute an Inspection and Logging Procedure for all dry control devices (e.g., fabric filters, cyclones, etc.). As a minimum, this Inspection and Logging Procedure shall include the following on a regularly scheduled basis:
 - i. Routine inspections of the device for proper cleaning, functioning, and cycling, and for the removal of captured dust from the device.
 - ii. Detailed inspections of control devices, fans, and all moving parts for material buildup, wear, and corrosion; including the logging of any broken bags by location in order to identify installation or equipment problems.
- d. The Permittee shall institute an Inspection and Logging Procedure for all wet control devices. This Inspection and Logging Procedure shall, at a minimum, include inspections as follows on a regularly scheduled basis:
 - i. Routine inspections of the device for the continuous measurement of the pressure loss of the gas stream through the wet control device and of the device for the continuous measurement of the liquid flow rate through the wet control device for plugging and proper operations; and
 - ii. Detailed inspections of control devices, fans, and all moving parts for material buildup, wear, and corrosion.
- e. Prompt repairs shall be made upon the identification of need either as a result of formal inspections or by other observations.

- f. Starch production shall not exceed the following limits:

<u>Item of Equipment</u>	<u>Processing Rate (Batches/Month)</u>
No. 2 Flash Dryer (26-10)	197
No. 3 Flash Dryer (26-12)	338
No. 5 Flash Dryer (26-18)	519
No. 4 Flash Dryer (26-15)	519 (6,228 batches per year)

- g. Operation of the affected ethylene oxide storage compound shall not exceed the following limits:

<u>Operating Scenario</u>	<u>Operating Hours (Hours/Year)</u>	<u>Scrubber Inlet Concentration (% EO)</u>	<u>Scrubber Outlet Concentration (ppm)</u>
Scenario 1	8,470	< 3.5	10
Scenario 2	289	> 3.5 & < 35	100

- h. Process rate for Starch Bin 5 and Railcar Loadout system (I.D.26-03) shall not exceed 11.25 tons of starch per hour.

7.3.6 Emission Limitations

- a. Emissions and operation of affected starch units shall not exceed the limits established in Attachment 2.

These limitations were established in Construction Permit 97080061. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- b. Emissions and operation of the new starch thinning process shall not exceed the following limits:

<u>Source No.</u>	<u>Item of Equipment</u>	<u>Throughput (Tons/Mo)</u>	<u>Particulate Matter Emissions (Lb/Hr)</u>	<u>(Tons/Yr)</u>
134-40	Surge Bin Starch Transfer and Blending	26,040	0.53	2.31

<u>Source No.</u>	<u>Item of Equipment</u>	<u>Throughput (Tons/Mo)</u>	<u>Particulate Matter Emissions</u>	
			<u>(Lb/Hr)</u>	<u>(Tons/Yr)</u>
134-41	Reactor Starch Transfer	26,040	0.37	1.62
134-42	Blend Bin Starch Transfer	26,040	0.30	1.32
134-43	Blend Bin Starch Blending	26,040	0.30	1.32

These limitations were established in Operating Permit 96010053. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- c. The emissions of ethylene oxide from all emission units controlled by Wet Scrubber (S-100A) shall not exceed the following:

<u>(Lb/Month)</u>	<u>(Lb/Year)</u>
31	312

This limitation was established in Joint Construction and Operating Permit 99120032. This limit ensures that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- d. Emissions of nitrogen oxide from Starch Flash Dryer #4 I.D. 26-15) shall not exceed 5.60 lb/hr and 25.00 tons/year. These limitations were established in Operating Permit 94090060. These limits ensure that the construction and/or modification addressed in the aforementioned Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- e. Emissions from #4 Starch Flash Dryer (I.D. 26-15) and #4 Flash Dryer Surge Hopper (I.D. 26-16) shall not exceed the following limits:

<u>Designation</u>	<u>Item of Equipment</u>	Particulate Matter Emissions	
		<u>(Lb/Hr)</u>	<u>(T/Yr)</u>
26-15	Starch Flash Dryer #4	8.00	35.00
26-16	#4 Flash Dryer Surge Hopper	0.20	0.90
		Total:	35.90

These limitations were established in Operating Permit 94090060. These limits ensure that the construction and/or modification addressed in the aforementioned Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

- a. For #4 Starch Flash Dryer (I.D. 26-15) and #4 Flash Dryer Surge Hopper (I.D. 26-16) a continuous monitoring system shall be installed, operated, calibrated, and maintained for the scrubber on the dryer system to verify proper operation of the scrubber, pursuant to 35 Ill. Adm. Code 201.281. The monitoring shall include the temperature and flow rate of the scrubbant fluid.
- b. The Permittee shall maintain logs for the operation of these monitoring systems. These logs shall include such information as calibration checks, adjustments, maintenance activities, and repair activities, and indicate periods when a monitor was not in service.
- c. The Permittee shall operate and maintain continuous monitors on the flash dryer scrubbers (26-10, 26-12, and 26-18) for water flow and scrubber pressure drop. Water flow may be measured directly or indirectly, e.g. pump speed or amperage.

7.3.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected starch unit to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total starch production of each dryer, tons/mo and tons/yr;
- b. Records of the monitoring data collected pursuant to Condition 7.3.8;
- c. Maintenance and repair log for air pollution control equipment; and
- d.
 - i. Number of hours operated at scenario 2 for ethylene oxide storage (hours/month and hours/year); and
 - ii. Ethylene oxide emissions with supporting calculations (lb/month and lb/year).
- e. The Permittee shall maintain records of the following items for Starch Transfer and Blending Units (I.D. 134-40 through 134-43):
 - i. Production (thin starch) on at least a monthly basis.
 - ii. Operation of control equipment (baghouse and wet scrubber) on at least a daily basis.
- f. Monthly and annual emissions calculated in accordance with compliance procedures established in Condition 7.3.12

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limitations as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the dust collectors as required by this section and the work-practices inherent in operation of the affected dry starch unit.

- b. To determine compliance with Condition 7.3.3 and 7.3.6, emissions of PM/PM₁₀ from the affected starch unit shall be calculated based on the following:

PM/PM₁₀ Emissions* = (Air Flow, cfm) x (Estimated Dust Loading, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr) x [1 - (Control Efficiency (%)/100)].

- c. HCL emissions from the storage activities shall be calculated based on the predicted scrubber airflow rate and exit concentrations.

7.4 VICO and Pilot Plant Areas

7.4.1 Description

VICO Process (Building 111) produces hydrolyzed vegetable proteins (HVP) used to make soy sauces and dry flavorings starting from various protein sources. The main proteins used are soy grits, corn gluten and wheat gluten. These proteins are broken down by using hydrochloric acid and water to perform the process called acid hydrolysis. The acid hydrolysis is done using either atmospheric and/or pressure digesters which break the protein down into amino acids using heat. The resulting amino acid mixture is then neutralized which forms salt and the pH is increased to a level safe for human consumption. The digest is then filtered to remove the humin, which is insoluble byproduct. After filtration the product is further refined using a process called base treat. This step is used to remove some unwanted components, which form during the acid hydrolysis step. The resulting base treated product is now called an intermediate and is stored in tanks for aging. The aged intermediate can be filtered and is used to make liquid condiments, soy sauces and supply both spray drying and vacuum drying process. The vacuum drying operation involves the evaporation of liquid into heavy paste. This paste is then blended with other ingredients and vacuum dried. The vacuum drying process removes the remaining moisture in the paste mix to a level of about 1%, producing a dry cake, which is broken up, ground fine and then further blended with other ingredients and packaged in boxes.

The Pilot Plant Area (Buildings 59, 114, 115, 119) is comprised of various small scale equipment for various unit operations to support corporate research and development activities aimed at improvement and development of new processes and products for the corn wet milling industry and provide a transition step between bench-scale operation and full-scale manufacturing installations. Starch modification, refining of sweeteners, and biochemical processes comprise the major focus in this area.

7.4.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 4	VICO Area	Bulk Meal Loading System (I.D. 111-08)	Bin Vent
		Bulk Meal Conveying System (I.D. 111-09)	Bin Vent
		Pneumatic Conveyor System #1 (I.D. 111-10)	Bag Filter

Emission Unit	Equipment	Description	Emission Control Equipment
		Bag Dump X 456 (I.D. 111 - 12)	Bag Filter
		Soda Ash Silo (I.D. 111 - 13)	Bin Vent
		Soda Ash Neutralization System (I.D. 111 - 14A)	Scrubber
		Soda Ash Neutralization System (I.D. 111 - 14B)	Scrubber
		East and West HCL Storage Tanks (I.D. 111 - 15)	Scrubber
		Carbon Bag Dump Aspiration System (I.D. 111 - 16)	Baghouse
		Spray Dryer & Product Transfer System (I.D. 111 - 17)	Cyclones, Scrubber
		Final Product Packing Bins (I.D. 111 - 18A and 18B)	Bin Vent Filter
		HVP Packer System (I.D. 111 - 19)	Bag Filter
		Base Treatment System (I.D. 111-20)	Ammonia Wash System
	Pilot Plant	Swenson Spray Dryer (I.D. 59 - 01B)	Cyclone, Baghouse
		Flash Dryer (I.D. 59 - 02)	Cyclones, Baghouse
		Dump Hopper (I.D. 59 - 03)	Scrubber
		Dextrose Fermentation Process with Nitrogen Blanket and Scrubbing (I.D. 114 - 01)	Scrubber
		Dextrose Fermentation Process (I.D. 119 - 01)	None

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected VICO and/or pilot plant unit" for the purpose of these unit specific conditions is a unit described in Conditions 7.4.1 and 7.4.2 above.
- b. Each affected VICO and/or pilot plant unit is subject either to 35 IAC 212.321(b) (1) or 35 IAC 212.322(b) (1), which provide that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which

construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

- ii. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

7.4.4 Non-Applicability of Regulations of Concern

None

7.4.5 Operational and Production Limits and Work Practices

- a. The Permittee shall follow good operating practices for the associated air pollution control devices, including periodic inspection, routine maintenance and repair of defects.
- b. The Permittee shall operate, maintain, and replace the fabric filters in a manner that assures compliance with the conditions of this Section.
- c. Operation of equipment shall not exceed the following limitation:

Emission Unit	Annual Operating Hours	PM Emission Factor	Exit Gas Flow Rate
111-08	8,760	0.01 gr/scf	700 scfm
111-09	8,760	0.01 gr/scf	700 scfm
111-13	8,760	0.01 gr/scf	450 scfm
111-14A	8,760	0.005 gr/scf	2,500 scfm
111-14B	8,760	0.005 gr/scf	1,000 scfm
111-15	8,760	-	400 scfm
111-20	8,760	-	1,000 scfm

- d. Operating Procedures for Control System: Written operating procedures shall be developed and maintained for equipment listed in Condition 7.4.5(c) describing normal air pollution control equipment operation including establishment of target levels for the following operating parameters:

- i. Scrubbant flow rate for the soda ash system and HCL tank scrubbers;
- ii. Scrubbant PH;
- iii. Scrubbbant recirculation flow rate and recirculant PH, if different from above.

Such procedures shall include maintenance practices and may incorporate manufacturers recommended operational instructions.

- e. Inspections: Visual inspections of equipment listed in 5a and associated control equipment shall be conducted on at least a monthly basis.
- f. Repairs: Prompt repairs of equipment listed in 5a and associated control equipment shall be made upon identification of need either as a consequence of formal inspections or other observations in conformance with good air pollution control practice.

7.4.6 Emission Limitations

- a. Emissions and operation of the natural gas-fired VICO spray dryer (111-17) shall not exceed the following limits:
 - i. Natural gas consumption shall not exceed 87.36 mmscf/yr.
 - ii. Emissions shall not exceed the following limits:

NO _x		CO	
(Lb/hr)	(T/yr)	(Lb/hr)	(T/yr)
1.0	4.37	0.21	0.92

These limitations were established in Joint Construction and Operating Permit 94110072. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- b. Emissions and operation of the natural gas-fired VICO spray dryer (111-17) with two primary spray dryer cyclones and two product transfer collecting cyclones all controlled by scrubber; two packing bins (111-18a

and 111-18b) each with a baghouse; and dry hydrogenated vegetable protein (HVP) packer (111-19) with baghouse shall not exceed the following limits:

PM/PM ₁₀ Emissions	
(Lb/hr)	(Ton/yr)
2.92	12.77

These limitations were established in Joint Construction and Operating Permit 94110072. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- c. Emissions and Emission Factors established in the Construction Permit 02020022:

- i. Concentration

Emission Unit	Pollutant	Concentration
111-14A	VOM	125 PPM
	HCL	5 PPM
	Acetaldehyde	2 PPM
	Formaldehyde	3 PPM
	Methanol	9 PPM
111-14B	VOM	125 PPM
	HCL	5 PPM
	Acetaldehyde	2 PPM
	Formaldehyde	3 PPM
	Methanol	9 PPM
111-15	HCL	250 PPM
111-20	VOM	400 PPM
	HCL	25 PPM

- ii. PM Emissions:

Emission Unit	PM/PM ₁₀ Emissions	
	(Lb/hr)	(Ton/yr)
111-08	0.3	0.26
111-09	0.3	0.26
111-13	0.04	0.17
111-14A	0.11	0.46
111-14B	0.04	0.18
111-15	0.57	2.5
111-20	--	--

iii. VOM and HAP emissions

Emission Unit	VOM		Acetaldehyde		Formaldehyde		Methanol		HCL	
	lb/hr	T/yr	Lb/hr	T/yr	Lb/hr	T/yr	Lb/hr	T/yr	Lb/hr	T/yr
111-14A	2	10	0.03	0.2	0.04	0.2	0.11	0.5	0.07	0.31
111-14B	1	4	0.01	0.1	0.01	0.1	0.04	0.2	0.03	0.1
111-15	--	--	--	--	--	--	--	--	0.57	2.5
111-20	1	4	--	--	--	--	--	--	0.14	0.6

These limitations were established in Joint Construction and Operating Permit 02020022. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- d. Emissions from the Fermentation Processes I and II (I.D. 114 - 01 and 119 - 01) shall not exceed the following limits:

Dextrose Fermentation	VOM Emissions (Lb/Hour)	VOM Emissions (Tons/Year)
Process I	0.2	0.9
Process II	0.2	0.9

These limitations were established in Joint Construction and Operating Permit 00060067. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- e. Particulate matter emissions from the Dump Hopper (I.D. 59-03) shall not exceed 0.27 lb/hour and 1.18 tons/year.

These limitations were established in Joint Construction and Operating Permit 99090021. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

- a. The Permittee shall monitor on at least a weekly basis the following parameters of acid scrubbers associated with emission units (I.D.111-14A, 14B, and 111-15):

Scrubbant recirculation flow rate (gallons/minute) and pH

- b. The Permittee shall conduct the following inspections of the control units:
 - i. Monthly visual inspections
 - ii. Monthly maintenance inspections
 - iii. Annual detailed inspections

7.4.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected VICO and/or pilot plant unit to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall maintain records of the following operating parameters for the control units of the affected emission units. These parameters shall be manually recorded at least once every hour, if automatic measurement and recording device(s) are not in service for more than two hours.
 - i. Scrubbant recirculation rate (gallons/minute)
 - ii. Recirculated Scrubbant pH
- b. Records of inspection, maintenance, monitoring and repair activities for all equipment listed in condition 7.4.5(c) and their associated control equipment shall be kept on site and shall include as a minimum:
 - i. Date of inspection, maintenance, and repair activities.
 - ii. Description of maintenance or repair activity if not routine preventative maintenance.
 - iii. Probable cause for requiring maintenance or repair if not routine or preventative.

- c. Natural gas usage (mmscf/mo and mmscf/yr) for the Spray Dryer (I.D. 111-17).
- d. The Permittee shall maintain records for any period during which equipment listed in Condition 7.4.5(c) was in operation when its air pollution control equipment was not in operation or was not operating properly.
 - i. These records shall include each period of time when an operating parameter of a control system, as recorded above, deviated outside the level set as good air pollution control practice (date, duration, and description of the incident).
 - ii. These records shall include the cause for pollution control equipment not operating properly or being out of normal service, for incidents when control equipment failed to operate properly and shall identify the corrective actions that were taken, the repairs that were made, and the steps that were taken to prevent any such reoccurrence.
 - iii. These records shall also identify any such periods during which an emission unit exceeded the requirements of this permit, including applicable emission limits. This record shall include the cause for noncompliance, if known and the corrective action(s) and preventative measures taken to prevent any such reoccurrence if any.
 - iv. Number of hours operated at each emission rate identified above on a monthly basis, with explanation.
 - v. Monthly emissions of PM, PM₁₀, VOM, and HAPs determined as the summation of the product of the above records.
 - vi. Annual emissions of PM, PM₁₀, VOM, and HAPs.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limitations as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the emission limitation of this permit as determined by the records required by this permit, the Permittee shall submit a report

to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the air control devices as required by this section and the work-practices inherent in operation of the affected units.
- b. To determine compliance with Condition 7.4.6, emissions shall be calculated based on the emission factors as delineated in Condition 7.4.5 and 7.4.6(c) (i) and the following equations:

PM/PM₁₀ Emission Calculations:

$$E \text{ (ton/yr)} = [E(\text{lb/hr}) * H(\text{hr/yr})] / 2000(\text{lb/ton})$$

$$E \text{ (lb/hr)} = [C(\text{gr/scf}) * Q(\text{scfm}) * 60(\text{min/hr})] / 7000(\text{gr/lb})$$

Where:

E = Emission Rate

C = Pollutant Concentration

Q = Exit Gas Flowrate

H = Hours of Operation

VOC and HAP Emission Calculations:

$$E \text{ (ton/yr)} = [E(\text{lb/hr}) * H(\text{hr/yr})] / 2000(\text{lb/ton}) * DE(\%) / 100$$

$$E \text{ (lb/hr)} = [C(\text{ppm}) * MW * Q(\text{scfm}) * 60(\text{min/hr})] / 385.3(\text{lb-mole/ft}^3) * 10^6$$

Where:

E = Emission Rate

C = Pollutant Concentration

Q = Exit Gas Flowrate

H = Hours of Operation

MW = Molecular Weight

DE = Destruction efficiency of control device

- c. Emissions from the natural gas combustion shall be calculated based on the following standard emission factors (AP-42, Table 1.4-1, 1.4-2):

Pollutant	Emission Factor (lb/10 ⁶ scf)
NO _x	100
CO	84
PM	7.6
VOM	5.5

7.5 Refinery Area

7.5.1 Description

The Refinery Area processes a portion of the starch slurry produced from the wet milling process. The starch slurry is pumped to the syrup refinery where it is converted to a variety of sugars using combinations of heat, acid, and specialized enzymes. These assorted products are then refined using combinations of carbon adsorbent and ion exchange processes to remove impurities, enhancing color, color stability, and taste. The carbon used is regenerated for reuse in the refining process. The syrup is evaporated to remove excess water and stored in tanks for loadout to tank trucks and railcars. Corn sweeteners and syrups are used in beverages, baking applications, canning and confections.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 5	Refinery Area	Refinery Bulk Filter Aid Silo & Bag Dump Station (I.D. 10 - 03)	Filter
		Refinery Bulk Filter Aid Day Bin (I.D. 10 - 03A)	Filter
		HCL Storage Tanks, General Acid Tank & Acid Converter Tank (I.D. 10 - 04)	Scrubber
		Two 5-Line Gam Reactor Vents (I.D. 10 - 05 & 06)	None
		Two 1-Line Gam Reactor Vents (I.D. 10 - 07 & 08)	None
		Recomp/Jets System (I.D. 10 - 09)	None
		Mud Centrifuge Tanks Aspiration Systems #1 - #3 (I.D. 10 - 10,11,12)	None
		Carbon Unloading System (I.D. 10A - 01)	Baghouse
		Bulk Soda Ash System (I.D. 16 - 01)	Scrubber
		CSS Product Bin (I.D. 17 - 01)	Baghouse
		CSS Packer Conveyor & Sifter (I.D. 17 - 02)	Baghouse
		CSS Kason Sifter (I.D. 17 - 03)	Baghouse
		CSS Packer (I.D. 17 - 04)	Baghouse
		Carbon Regeneration Furnace (I.D. 85 - 01)	Afterburner

Emission Unit	Equipment	Description	Emission Control Equipment
		Granular Activated Carbon Regeneration Furnace (I.D.17-05) [proposed unit]	Afterburner and Venturi Scrubber

7.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected refinery unit" for the purpose of these unit specific conditions is a unit described in Conditions 7.5.1 and 7.5.2 above.
- b. Each affected refinery unit is subject either to 35 IAC 212.321(b) (1) or 35 IAC 212.322(b) (1), which provide that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].
 - ii. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].
- c. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission source to exceed 2000 ppm [35 IAC 214.301].
- d. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission source, except as provided in Sections 215.302, 215.303, 215.304 and the following exception: If no odor nuisance exists the limitation of this Subpart shall apply only to photochemically reactive material [35 IAC 215.301].

7.5.4 Non-Applicability of Regulations of Concern

None

7.5.5 Operational and Production Limits and Work Practices

- a. Operating parameters of the affected Granular Activated Carbon Regeneration Furnace (I.D.17-05) shall comply with the following limitations:
 - i. Minimum afterburner combustion chamber temperature: 1400°F
 - ii. Scrubber pressure drop: 18-26 inches H₂O
 - iii. Scrubbant pH range greater than 6
 - iv. Minimum scrubbant flowrate: 850 gal/min
 - v. Maximum carbon furnace scrubber exhaust airflow 10,100 acfm
- b. The Permittee shall operate, maintain, and repair the affected regeneration system, including associated control equipment consistent with good air pollution control practice, including the following:
 - i. Written operating procedures shall be developed and maintained. Such procedures shall include maintenance practices and may incorporate manufacturers recommended operational instructions.
 - ii. Inspections: Visual inspections of equipment shall be conducted on at least a weekly basis.
 - iii. Repairs: Prompt repairs shall be made upon identification of need either as a consequence of formal inspections or other observations in conformance with good air pollution control practice.
 - iv. Records: Records of inspection, maintenance, and repair activities shall be kept on site and shall include as a minimum:
 - A. Date of inspection, maintenance, and repair activities.
 - B. Description of maintenance or repair activity if not routine preventative maintenance.

C. Probable cause for requiring maintenance or repair if not routine or preventative.

- c. Upon construction of a new Carbon Regenerative Furnace (I.D.17-05) and within 180 days of it startup an existing Carbon Regenerative Furnace (I.D.85-01) along with existing Carbon Unloading System(I.D. 10A - 01) shall be shut down.
- d. The Permittee shall follow good operating practices for the associated air pollution control devices, including periodic inspection, routine maintenance and repair of defects.
- e. The Permittee shall operate, maintain, and replace the fabric filters in a manner that assures compliance with the conditions of this Section.

7.5.6 Emission Limitations

Emissions from the affected new regeneration furnace (I.D.17-05) shall not exceed the following limits:

	PM ₁₀	SO ₂	NO _x	CO	VOM
Lb/Hour	1.43	2.9	4.0	7.3	2.3
Tons/Month	0.6	1.3	1.8	3.2	1.0
Tons/Year	6.3	12.7	17.7	31.8	10.0

These limitations were established in Construction Permit 03030049. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

7.5.7 Testing Requirements

The Permittee has to follow initial testing requirements established in Condition 7 of Construction Permit #03030049 for a new regeneration furnace.

7.5.8 Monitoring Requirements

The Permittee shall install, maintain and operate continuous monitors on the new regeneration furnace that supply continuous readings and store average hourly values for the following parameters:

- a. Pressure drop across the scrubber system.
- b. Scrubbant recirculation rate (gallons/minute).

- c. Recirculated scrubbant pH.
- d. Afterburner combustion chamber temperature (°F).

7.5.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected refinery unit to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Raw material throughput, tons/mo and tons/yr;
- b. Total HCL usage, tons/mo and tons/yr;
- c. Maintenance and repair log for air pollution control equipment;
- d. Records related to operation of new regenerative furnace:
 - i. The Permittee shall maintain an operating log for the affected regeneration system that as a minimum includes operating hours and operating rate of the system.
 - ii. The Permittee shall maintain the following operating records for the scrubber associated with the affected regeneration system. This data shall be recorded whenever an item is changed:

Desired flow rate value of recycled scrubbant.
 - iii. The Permittee shall keep records of all emission measurements conducted pursuant to Condition 7.5.7.
 - iv. The Permittee shall maintain records for any period during which the affected regeneration system was in operation when its air pollution control equipment was not in operation or was not operating properly.
 - A. These records shall include each period of time when an operating parameter of a control system, as recorded above, deviated outside the level set as good air pollution control practice (date, duration, and description of the incident).

- B. These records shall include the cause for pollution control equipment not operating properly or being out of normal service, for incidents when control equipment failed to operate properly and shall identify the corrective actions that were taken, the repairs that were made, and the steps that were taken to prevent any such reoccurrence.
- C. These records shall also identify any such periods during which an emission unit exceeded the requirements of this permit, including applicable emission limits. This record shall include the cause for noncompliance, if known and the corrective action(s) and preventative measures taken to prevent any such reoccurrence if any.
- v. The Permittee shall keep records of emissions of PM, SO₂, VOM, NO_x, and CO tons/month and tons/year with supporting calculations.
- e. Monthly and annual emissions calculated in accordance with compliance procedures established in Condition 7.5.12.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limitations as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the emission limitations of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

None

7.5.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the dust collectors as required by this section and the work-practices inherent in operation of the affected refinery unit.
- b. To determine compliance with Conditions 7.5.3 and 7.5.6, emissions of PM₁₀ from the affected refinery unit shall be calculated based on the following:

PM Emissions* = (Air Flow, cfm) x (Estimated Dust Loading, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr) x [1 - (Filter Efficiency (%)/100)].

* As specified by the manufacturer or vendor of the filter, or air testing of the actual equipment, or testing of similar equipment at this or other facilities, or based on vendor or manufacturer outlet concentration guarantees or predicted outlet emission performance, or based on the standard EPA emission factors such as AP42. If compliance testing has been conducted to determine mass emission rates, then the test data may be used in lieu of the above. Vendor outlet concentration guarantees and predicted performance, or experience with similar equipment, may be used in place the equation above.

- c. For calculation of HCL and SO₂ emissions, the following equation shall be used:

$$E_r = \frac{(C_x * MW_x * Q * 60)}{(V * 10^6)}$$

Where:

E_r = Pollutant emission rate, lb/hr
 C_x = Concentration of pollutant, ppm
 MW_x = Molecular weight of pollutant, lb/lb-mole
 Q = Exit gas flow rate, scfm
 V = Volume occupied by 1 mole, 385.2 lb/ft³

For calculation annual HCL and SO₂ emissions, hourly emission rate (E_r) shall be multiplied by hours of operation of each affected refinery unit.

- d. Compliance with the emission limits in Condition 7.5.6 for new regenerative furnace shall be based on the monitoring and recordkeeping requirements in Conditions 7.5.8 and 7.5.9 and appropriate emission factors developed from the emission testing required by Condition 7.5.7 (or for NO_x, standard emission factors published by USEPA).

7.6. Dextrose Area

7.6.1 Description

The Dextrose Area produces dry crystalline monohydrate dextrose, liquid reconstituted dextrose and polymerized dextrose (polydextrose). Corn syrup from the refinery is crystallized and refined an almost pure dextrose monohydrate crystal. Crystalline dextrose is shipped to customers in bags, totes, bulk trucks and rail cars. Liquid products are transported by both rail and truck.

7.6.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description/Date of Construction/Modification	Emission Control Equipment
Group 6	Dextrose Area (#44 Building)	Classifying System & Product Handling (I.D. 44 - 01); 1992 - Modification	Baghouse
		Dextrose Hydrate Dryer (I.D. 44 - 05); 1991 - Construction	Baghouse
		Cargocaire Dehumidification System Breather (I.D. 44 - 09); 1991 - Construction	None
		Natural Gas-Fired Oil Heater (I.D. 44 - 10)	
		Polydex Conveying (I.D. 44 - 11); 1997	Baghouse
		Polydex Packer (I.D. 44 - 12); 1997	Baghouse
		Polydex Product Bin (I.D. 44 - 13); 1998	Baghouse
		Polydex Bag Dump & Packer Aspiration Baghouse (I.D. 44 - 14); 1998	Baghouse
		Dryer/Cooler (I.D. 44-15) [Proposed]	Baghouse
		Storage Bin (I.D. 44-16) [Proposed]	Baghouse
	Dextrose Area (#99 Building)	Bulk Dextrose Unloading System (I.D. 99-01AD & 02AD)	Filters
		Feed Bin Dust Collection System (I.D. 99-05AD)	Filters
		Dryer/Cooler Dust Collector Systems (I.D. 99-06AD & 07AD)	Filters

Emission Unit	Equipment	Description/Date of Construction/Modification	Emission Control Equipment
		Bulk Loadout System (I.D. 99-08AD)	Filters
		House Dust Collection System (I.D. 99-09AD)	Filters
		Finished Product Conveying System (I.D. 99-10AD & 11AD)	Filters
		Reject Unloading/Packer Bin Dust Collection (I.D. 99-12AD)	Filters
		Sweco Screener (I.D. 99-14AD)	Dust Collector

7.6.3 Applicability Provisions and Applicable Regulations

- a. An "affected dextrose unit" for the purpose of these unit specific conditions combines a number of operations where liquid dextrose is crystallized, dried, transported, stored, and packed in bags or loaded out in bulk by truck or rail.
- b. An affected dextrose unit is subject either to 35 IAC 212.321(b) (1) or 35 IAC 212.322(b) (1), which provide that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].
 - ii. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

7.6.4 Non-Applicability of Regulations of Concern

None

7.6.5 Operational and Production Limits and Work Practices

- a. The Permittee shall follow good operating practices for the filters, including periodic inspection, routine maintenance and repair of defects.
- b. The Permittee shall operate, maintain, and replace the fabric filters in a manner that assures compliance with the conditions of this Section.
- c. Emission units operated in Building 99 shall be shut down, as a part of consolidation of Building 99 operations into Building 44, after new units of Building 44 would be fully operational.

7.6.6 Emission Limitations

In addition to Condition 5.2.2, an affected dextrose unit is subject to the following:

- a. Emissions and operation of affected dextrose units operated in Building 44 shall not exceed the following limits:

	Maximum Air Flow	PM Emissions	
Equipment	(scfm)	(Lb/hr)	(T/yr)
Classifying & Handling (I.D. 44-01)	19,200	1.60	7.2
Dextrose Hydrate Dryer (44-05)	35,000	2.10	9.2
Cargocaire Breather Vents (I.D. 44-09)	1,000	0.17	0.7

These limitations were established in Permit 72120248. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- b. PM emissions from each affected unit with ID's 44-11 and 44-12 shall not exceed 0.07 lb/hr and 0.31 t/yr.

These limitations were established in Joint Construction and Operating Permit 97010067. These limits ensure that the construction and/or modification addressed in the aforementioned

Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- c. PM emissions from each affected unit with ID's 44-13 and 44-14 shall not exceed 0.03 lb/hr and 0.13 t/yr for 44-13 and 0.08 lb/hr 0.35 t/yr for 44-14.

These limitations were established in Construction Permits 98030088 and 98040064. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permits does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- d. The operation and emission of Dryer/Cooler (I.D. 44-15) and Storage Bin (I.D. 44-16) shall not exceed the following limitations:

<u>Unit</u>	Maximum Air		PM Emissions (T/Yr)
	Flow (scfm)	(Lb/Hr)	
Dryer/Cooler	20,000	1.71	7.5
Storage Bin	2,000	0.17	0.75
		Total:	8.25

These limitations were established in Construction Permit 03050006. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- e. The emissions of affected dextrose units operated in Building 99 shall not exceed the following limits:

PM ₁₀ Emissions Lb/hr	PM ₁₀ Emissions T/yr
3.45	13.76

These limitations were established in Construction Permit 95110035. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification

pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

7.6.7 Testing Requirements

None

7.6.8 Monitoring Requirements

None

7.6.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected dextrose unit to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Process (production) rate for affected dextrose unit, ton/hr and ton/yr;
- b. Hours of operation for each dextrose unit, hr/yr;
- c. Control devices inspection and maintenance log; and
- d. Monthly and annual emissions of PM₁₀ calculated in accordance with compliance procedures established in Condition 7.6.12.

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limitations as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the emission limitation of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of filters as required by this section and the work-practices inherent in operation of the dextrose unit.
- b. To determine compliance with Condition 7.6.6, emissions of PM/PM₁₀ from the affected dextrose unit shall be calculated based on the following:

$$\text{PM Emissions}^* = (\text{Air Flow, cfm}) \times (\text{Estimated Dust Loading, gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [1 - (\text{Control Device Efficiency (\%)} / 100)].$$

- * As specified by the manufacturer or vendor of the filter, or air testing of the actual equipment, or testing of similar equipment at this or other facilities, or based on vendor or manufacturer outlet concentration guarantees or predicted outlet emission performance, or based on the standard EPA emission factors such as AP42. If compliance testing has been conducted to determine mass emission rates, then the test data may be used in lieu of the above. Vendor outlet concentration guarantees and predicted performance, or experience with similar equipment, may be used in place the equation above.

- c. Emissions as product of natural gas combustion from oil heater shall be calculated based on the following standard AP-42 emission factors:

Pollutant	Emission Factor (lb/10 ⁶ scf)
NO _x	100
CO	84
PM	7.6
VOM	5.5

7.7 Group 7: Utilities

7.7.1 Description

The Utilities area provides steam, compressed air, cooling and process water services used by the entire plant.

7.7.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description/Date of Construction	Emission Control Equipment
Group 7	Utilities	Building #1	
		Boiler #23 (Natural Gas-Fired, 162.3 mmBtu/Hr)	None
		Boiler #25 (Natural Gas-Fired, 273 mmBtu/Hr)	None
		Package Boiler #27 (Natural Gas-Fired; Distillate Fuel Oil as Backup; 196 mmBtu/Hr)	None
		Package Boiler #28 (Natural Gas-Fired; Distillate Fuel Oil as Backup; 196 mmBtu/Hr)	None
		Building #123	
		Boiler #1 (Coal-Fired, 470 mmBtu/Hr)	Baghouse
		Boiler #2 (Coal-Fired, 470 mmBtu/Hr)	Baghouse

7.7.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler" for the purpose of these unit specific conditions is a boiler described in Conditions 7.7.1 and 7.7.2 above.
- b. Affected boilers are subject to 35 IAC 216.121. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source to exceed 200 ppm, corrected 50 percent excess air.
- c. The affected boilers #1 and #2 are subject to the following: No person shall cause or allow the emission of smoke or other particulate matter into the atmosphere from any fuel combustion emission unit for which construction or modification commenced on or after April 14, 1972, with actual heat input greater than 73.2 MW (250 mmBtu/hr), having an opacity greater than 20 percent [35 IAC 212.122(a)].

- d. The affected boilers #27 and #28 are subject to 40 CFR Part 60 Subpart Db and shall not exceed 0.20 lbs of NO_x per million Btu pursuant to 40 CFR 60.44b(a) (1) (ii).
- e. The opacity from boilers #27 and #28 shall not exceed 20 percent except for one six-minute period per hour of not more than 27 percent opacity pursuant to 40 CFR 60.43b(f). This limit applies at all times except during startup, shutdown or malfunction, as defined at 40 CFR 60.2
- f. Emissions of particulate matter (PM) and sulfur dioxide (SO₂) from each of the boilers #27 and #28 on oil firing shall not exceed 0.1 lbs/mmBtu and 0.3 lbs/mmBtu, respectively, in accordance with 35 Ill. Adm. Code 212.206 and 214.122(b) (2) which are more stringent than the NSPS.
- g. The affected boilers #1 and #2 are subject to emission limits and requirements of 40 CFR Part 60 Subparts D and Db and shall not exceed the following limits:
 - i. NO_x: 0.60 lb/mmBtu (Subpart Db);
 - ii. SO₂: 1.2 lb/mmBtu (Subpart D);
 - iii. PM: 0.051 lb/mmBtu (Subpart Db); and
 - iv. Opacity: 20 percent (Subpart (Db))
- h. The nitrogen oxides emission standards under 40 CFR 60.44b shall apply at all times, pursuant to 40 CFR 60.46b(a), including periods of startup, shutdown, or malfunction
- i. The particulate matter emission standards under 40 CFR 60.43b shall apply at all times except during periods of startup, shutdown, or malfunction, pursuant to 40 CFR 60.46b(a).
- j. Affected boilers #1, #2 and 25 are subject to requirements of 35 IAC Part 217, Subpart U "NO_x, Control and Trading Program For Specified NO_x Generating Units". Certain requirements of Subpart U are discussed in Section 6.0 "NO_x Trading Program".

7.7.4 Non-Applicability of Regulations of Concern

- a. Coal fired boilers #1 and #2 are not subject to the emission standards established in 35 IAC 212.204 and 35 IAC 217.121(d) because of the more stringent NSPS emission standards described in Condition 7.7.3(g).

- b. This permit is issued based on the affected boilers #23, #25, #27 and #28 not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM), because the affected boilers do not use an add-on control device to achieve compliance with an emission limitation or standard.
- c. This permit is issued based on the affected boilers #23, #27 and #28 not being subject to requirements of 35 IAC Part 217, Subpart U "NO_x, Control and Trading Program For Specified NO_x Generating Units" because the firing rate of each of these boilers is less than 250 mmBtu/hr.

7.7.5 Operational and Production Limits and Work Practices

- a. Only natural gas shall be used as a fuel for affected boilers #23 and #25,
- b. Distillate fuel oil may be used as a backup fuel for boilers #27 and #28.
- c.
 - i. Only coal and natural gas (for startup and low load operations) shall be used as a fuel for affected boilers #1 and #2.
 - ii. Affected boilers #1 and #2 are equipped with a 43.5 mmBtu/hr natural gas duct burner. The duct burner is operated only during boiler startup and low load operations. The operation of each burner is limited to 500 hours of operation per year. Annual emissions from natural gas combustion of these burners shall be calculated based on the compliance procedure requirements of Condition 7.7.12.
 - iii. The Permittee is allowed to burn spent activated carbon in Boilers #1,2 and by spreading the carbon over the coal pile to be burned with the primary coal feed. The spent activated carbon shall not be hazardous.
 - iv. The use of petroleum coke as a supplemental fuel in Boilers #1 and #2 is allowed up to 65 percent on a heat input basis and only for performance test for the petroleum coke utilization as addressed in the company's letter dated September 7 and September 8, 1994. For any purposes other than described above, burning of petroleum coke is prohibited.

- d. Affected boilers #27 and #28 shall operate only to makeup lost steam production (on a pound per pound basis) unavailable from affected boilers #1, #2, #23, and #25.
- e. The total steam production rate for all affected boilers combined shall not exceed 1,078,000 lbs per hour.
- f. The total distillate fuel usage for boilers #27 and #28 shall not exceed 1.4 million gallons per year.
- g. Malfunction and Breakdown Provisions

In the event of a malfunction or breakdown of an affected boilers #1 and #2, the Permittee is authorized to continue operation of the affected boilers in violation of the applicable requirements of Conditions 7.7.3 (except the NO_x standard under 40 CFR 60 44b), as necessary to provide essential service, prevent risk of injury to personnel or severe damage to equipment, or if shutting down the boiler would lead to a greater amount of emissions during subsequent startup than would be caused by continuing to run the boiler for a short period until repairs can be made. This authorization is subject to the following requirements:

- i. Upon occurrence of excess emissions due to malfunction or breakdown, the Permittee shall as soon as practicable repair the affected boiler(s) or remove the boiler(s) from service, so that excess emissions cease. This shall be accomplished within 12 hours or noon of the Illinois EPA's next business day, whichever is greater, unless the Permittee obtains an extension from the Illinois EPA. The Illinois EPA may grant such extension if the Permittee demonstrates that the affected boiler(s) could not be reasonably repaired or removed from service within the allowed time and that, based on the actions, which have been taken and will be taken, the Permittee is taking reasonable steps to minimize excess emissions and will repair the affected boiler(s) or remove it from service as soon as practicable.
- ii. The Permittee shall fulfill all applicable recordkeeping and reporting requirements of Conditions 7.7.9 and 7.7.10.

iii. Following notification to the Illinois EPA of a malfunction or breakdown with excess emissions, the Permittee shall comply with all reasonable directives of the Illinois EPA with respect to such incident, pursuant to 35 IAC 201.263.

i. Startup Provisions

The Permittee is authorized to operate the affected boilers #1 and #2 in violation of the applicable limits of Conditions 7.7.3 during startup pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all reasonable efforts have been made to minimize startup emissions, duration of individual startups and frequency of startups. This authorization is subject to the following requirements:

- i. This authorization only extends for a period of up to 12 hours following initial firing of fuel during each startup event. This limitation shall not apply when extended low temperature operation of the boiler is necessary for replacement refractory curing or other required maintenance activities.
- ii. The Permittee shall conduct startup of the affected boilers in accordance with the manufacturer's written or electronic instructions or other written or electronic instructions maintained on the site that are specifically developed to minimize excess emissions from both "cold" and "hot" startups and that include, at a minimum, the following measures:
 - A. Review of the operational condition of the affected boilers prior to initiating startup of the boiler; and
 - B. Periodic review of the operating parameters of the affected boilers during each startup accompanied by appropriate adjustments to the startup to reduce or eliminate excess emissions.

7.7.6 Emission Limitations

The affected boilers shall not exceed the following emission limits:

- a. Coal-Fired Boilers #1 and #2:

CO (T/yr)	PM* (T/yr)	VOM (T/yr)	NO _x (T/yr)	SO ₂ (T/yr)
920.0	206.0	13.0	2,470.0	4,941.0

These limitations were established in Construction/Operating Permit 85070061. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

b. Boilers #27 and #28:

i. Natural Gas Mode

NO _x T/yr
342.0

These limitations were established in Construction/Operating Permit 90020094. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

ii. Fuel Oil #2 Mode

E M I S S I O N S					
PM		SO ₂		NO _x	
(T/mo)	(T/yr)	(T/mo)	(T/yr)	(T/mo)	(T/yr)
0.14	1.4	3.3	33.0	1.68	16.8

The above limitations contain revisions to previously issued Permit 96120011. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and

has addressed the applicability and compliance of Title I of the CAA, specifically 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, hourly emission limits have been replaced by monthly limits and annual emission limits are calculated by using standard emission factors from AP-42 and 1.4 million gallons of fuel #2 per year [T1R].

c. Boiler #23:

NO _x
T/yr
39.9

These limitations were established in Operating Permit 73020086. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- d. Compliance with annual limits established above shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.7.7 Testing Requirements

- a. Upon reasonable request from the Illinois EPA or USEPA, emissions of nitrogen oxides from natural gas fired boilers ##27 and 28 shall be determined in accordance with requirements of 40 CFR 60.46b(e) (4).
- b. Upon reasonable request from the Illinois EPA or USEPA, emissions of nitrogen oxides from boilers #1 and 2 shall be determined in accordance with requirements of 40 CFR 60.46b(e) (2).

- c. Upon reasonable request from the Illinois EPA or USEPA, emissions of PM from boilers #1 and 2 shall be determined in accordance with requirements of 40 CFR 60.46b(d).
- d. Upon reasonable request from the Illinois EPA or USEPA, emissions of SO₂ from boilers #1 and 2 shall be determined in accordance with requirements of 40 CFR 60.46(b).

7.7.8 Monitoring Requirements

a. Boilers #1 and #2

- i. The Permittee shall install, calibrate, maintain, and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system [40 CFR 60.48b(a)].
- ii. The Permittee shall install, calibrate, maintain, and operate a continuous monitoring system and record the output of the system, for measuring nitrogen oxides emissions discharged to the atmosphere [40 CFR 60.48b(b)(1)].
- iii. The Permittee shall install, calibrate, maintain, and operate a continuous monitoring system for measuring sulfur dioxide emissions discharged to the atmosphere pursuant to 40 CFR 60.45.

b. Boilers #27 and #28

- i. The Permittee shall install, calibrate, maintain, and operate a continuous monitoring system for measuring nitrogen oxide emissions discharged to the atmosphere pursuant to 40 CFR 60.48b.
- ii. The Permittee shall install, calibrate, maintain and operate a continuous monitoring system for measuring the opacity of emissions discharged to the atmosphere and record the output of the system.
- iii. The Permittee in lieu of installing the continuous opacity monitoring system, shall monitor visible emissions at least four times per day during daylight hours by using a certified visible emission observer. These observations shall be taken in accordance with EPA Method 9. Visible emissions shall be

observed during conditions representative of normal operation.

- iv. Monitoring requirements of Condition 7.7.8(b)(ii) and (b)(iii) are only applied when boilers #27 and 28 utilize distillate fuel oil.

7.7.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected boilers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

a. Coal Fired Boilers #1 and #2:

- i. Amount of coal consumed (tons/month and tons/year).
- ii. The Permittee shall maintain records for the continuous monitoring system on each affected boiler that as a minimum shall include:
 - A. Emissions measurements.
 - B. Continuous monitoring system performance testing measurements.
 - C. Performance evaluations and other quality assurance/control activities.
 - D. Calibration checks.
 - E. Maintenance and adjustment performed.
 - F. Periods when the monitor was inoperative, with date, time and reason.
 - G. Quarterly reports submitted in accordance with Condition 7.7.10.
- iii. Records for Startups:
 - A. Records of the source's established startup procedures for affected boilers; and
 - B. Records for each startup of an affected boiler that results in excess of opacity or regulated air pollution emissions.
- iv. Records for Continued Operation during Malfunctions and Breakdowns:

- A. A maintenance and repair log for each affected boiler and associated control equipment, listing each activity performed with date; and
- B. Records for each incident when operation of an affected boiler continued during malfunction or breakdown, including the following information:
 - 1. Date and duration of malfunction or breakdown.
 - 2. A description of the malfunction or breakdown.
 - 3. The corrective actions used to reduce the quantity of emissions and the duration of the incident.
 - 4. If excess emissions occurred for twelve or more hours:
 - An explanation why continued operation of the affected boiler was necessary.
 - The preventive measures planned or taken to prevent similar malfunctions or breakdowns or reduce their frequency and severity.
 - An estimate of the magnitude of excess emissions during the incident.
- v. Emissions of regulated air pollutants calculated based on compliance procedure established in Condition 7.7.12;
- vi. Hours of operation of duct burners (hours/mo and hours/year).
- b. Boilers #27 and #28:
 - i. Natural gas consumption (total), mmscf/mo and mmscf/year;
 - ii. Fuel oil #2 consumption (total), gal/mo and gal/yr;

- iii. Emissions of regulated air pollutants calculated based on compliance procedure established in Condition 7.7.12;
 - iv. Records for continuous monitoring systems of boilers ##27 and 28;
 - v. The owner or operator of an affected facility shall record and maintain records of the amounts of each fuel combusted during each day.
 - vi. The Permittee shall obtain and maintain the fuel receipts from the fuel supplier for very low sulfur oil and quarterly reports shall also certify that only very low sulfur oil was burned in the boiler during the preceding quarter, as applicable in Section 60.49b(r).
- c. The Permittee shall keep records of the monthly and annual natural gas usage (mmscf/mo/yr) for Boiler #23.
- d. The Permittee shall keep records of the total hourly steam production rate for all affected boilers operated at this site.
- e. The Permittee shall keep records of the total amount of spent activated carbon burned in boilers ##1 and 2.
- f. The owner or operator of an affected facility subject to the nitrogen oxides standards under 40 CFR 60.44b shall maintain records of the following information for each steam generating unit (#1, #2, #27, #28) operating day:
 - i. Calendar date;
 - ii. The average hourly nitrogen oxides emission rates (expressed as NO₂) (ng/J lb/million Btu heat input) measured or predicted;
 - iii. The 30-day average nitrogen oxides emission rates (ng/J or lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days;
 - iv. Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in

excess of the nitrogen oxides emissions standards under 40 CFR 60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken;

- v. Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;
- vi. Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;
- vii. Identification of "F" factor used for calculations, method of determination, and type of fuel combusted;
- viii. Identification of the times when the pollutant concentration exceeded full span of the continuous monitoring system;
- ix. Description of any modification to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with Performance Specification 2 or 3; and
- x. Results of daily CEMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1 [40 CFR 60.49b(g)].

7.7.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limitations as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. Excess emission reports [40 CFR 60.49b(h)]:

Any affected facility subject to the opacity standards under 40 CFR 60.43(b) or the nitrogen oxides standard under 40 CFR 60.44b is required to submit excess emission reports for any excess emissions which occurred during the reporting period.

- b. Continuous monitoring requirement reports [40 CFR 60.49b(i)]:

The owner or operator of affected boilers #1, #2, #27, and #28 subject to the continuous monitoring requirements for nitrogen oxides under 40 CFR 60.48b shall submit reports containing the information recorded under 40 CFR 60.49b(g) (Condition 7.7.9(e) of this permit).

- c. The owner or operator of an affected facility may submit electronic quarterly reports for SO₂ and/or NO_x and/or opacity in lieu of submitting the written reports required under 40 CFR 60.49b(h), (i), (j), (k), or (l). The format of each quarterly electronic report shall be coordinated with the permitting authority. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the owner or operator, indicating whether compliance with the applicable emission standards and minimum data requirements of 40 CFR 60.49(b) was achieved during the reporting period. Before submitting reports in the electronic format, the owner or operator shall coordinate with the permitting authority to obtain their agreement to submit reports in this alternative format [40 CFR 60.49b(v)].
- d. The reporting period for the reports required under 40 CFR 60.49(b) is each 6 month period. All reports shall be submitted to the Illinois EPA and shall be postmarked by the 30th day following the end of the reporting period [40 CFR 60.49b(w)].

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

Affected boilers #27 and #28 shall operate only to makeup lost steam production (on a pound per pound basis) unavailable from affected boilers #1, #2, #23, #25.

7.7.12 Compliance Procedures

- a. Compliance with the opacity limitation of Condition 7.7.3 for affected boilers #1 and #2 is addressed by the continuous opacity monitoring system for these boilers.
- b. Compliance with PM emission limitations of Condition 7.7.3 for affected boilers #1 and #2 is achieved by the proper operation of baghouses.
- c. Compliance with NO_x and SO₂ limitations for all boilers are achieved by inherent operation of affected boilers and testing requirements in Condition 7.7.7

- d. Compliance with emission limitations of Condition 7.7.6 for coal-fired boilers #1 and #2 shall be based on the recordkeeping requirements in Condition 7.7.9 and either the emission factors/formulas listed below or most recent stack test data:

- i. AP-42 Emission Factors (Tables 1.1-3, 1.1-4)

Pollutant	Emission Factor, lb/ton
SO ₂	$39.6S^*(Ca/S)^{-1.9}$ **
NO _x	5
CO	18
PM ₁₀	17***
HCL	1.2
HF	0.15

* Coal sulfur content, weight %

** Ca/S is the molar calcium-to-sulfur ratio in the bed. This equation may be used when the Ca/S is between 1.5 and 7. When no calcium-based sorbents are used and the bed material is inert with respect to sulfur capture, the emission factor for underfeed stokers should be used to estimate SO₂ emissions.

*** Spreader Stoker (with multiple cyclones and reinjection), as recommended in Table 1.1-4 for FBC with circulating bed

Emissions (lb) = actual firing rate multiplied by the appropriate emission factor listed above and considering efficiency of control device (if applicable).

- ii. Stack Test Data, if available (need to be specified by Permittee)
- iii. Emissions from the natural gas-fired duct burners shall be calculated based on standard emission factors of AP-42 and actual hours of operation.
- e. Compliance with emission limitations of Conditions 7.7.6 for boilers #27 and 28 shall be based on the recordkeeping requirements in Condition 7.7.9 and either the emission factors/formulas listed below or most recent stack test data:

- i. Boilers #27, #28

A. Natural Gas Mode (AP-42, Table 1.4-1, 1.4-2)

Pollutant	Emission Factor (lb/10 ⁶ scf)
NO _x	190
CO	84
PM	7.6
VOM	5.5

B. Fuel Oil #2 Mode (AP-42, Table 1.3-1)

Pollutant	Emission Factor, lb/10 ³ gal
NO _x	24
SO ₂	142S*
PM	2
CO	5

* Sulfur content in the oil

ii. Boilers #23, #25 (AP-42, Table 1.4-1, 1.4-2)

Pollutant	Emission Factor (lb/10 ⁶ scf)
NO _x	280 (for #25); 140*
CO	84
PM	7.6
VOM	5.5

* Low NO_x burners

7.8 Group 8: Coal Handling and Ash Processing Units

7.8.1 Description

This group of emission units is used for servicing boilers that includes coal and limestone storage and preparation/conveying along with ash conveying and storage.

7.8.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 8		Coal & Limestone Crushers & Conveyors (I.D. 123 - 01)	Baghouse
		Coal and Limestone Conveyors (I.D. 123 - 02)	Baghouse
		Coal Silo (I.D. 123 - 03)	Baghouse
		Two Limestone and four Coal Bunkers (I.D. 123 - 04)	Baghouse
		Boiler Ash Pneumatic Conveyor Systems "A" and "B" (I.D. 123 - 05 and 06)	Baghouses
		Ash Silo (I.D. 123 - 07)	Baghouse
		Sand Bunkers ##1 and 2 (I.D. 123 - 10/11)	Baghouses
		HCL Storage Tank (10,000 gallons, I.D. 123 - 12)	Scrubber

7.8.3 Applicability Provisions and Applicable Regulations

- a. An "affected coal handling and ash processing unit" for the purpose of these unit specific conditions is equipment described in Conditions 7.8.1 and 7.8.2.
- b. The affected coal handling and ash processing unit is subject to 35 IAC 212.321(b) (1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or

after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 1) [35 IAC 212.321(a)].

7.8.4 Non-Applicability of Regulations of Concern

None

7.8.5 Operational and Production Limits, and Work Practices

- a. The Permittee shall follow good operating practices for the baghouses, including periodic inspection, routine maintenance and repair of defects.
- b. The Permittee shall operate, maintain, and replace the fabric filters in a manner that assures compliance with the conditions of this Section.

7.8.6 Emission Limitations

In addition to Condition 5.2.2, this equipment is subject to the following:

- a. Opacity from affected coal handling and ash processing unit shall not exceed 10%.
- b. Total annual PM emissions shall not exceed 10.1 tons/year.

These limitations were established in Operating Permit 85070061. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically Major Stationary Sources Construction and Modification and Prevention of Significant Deterioration of Air Quality Regulations (PSD) of 40 CFR 52.21 [T1].

- c. Compliance with annual limits established above shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.8.7 Testing Requirements

None

7.8.8 Monitoring Requirements

None

7.8.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for this equipment to demonstrate compliance with Conditions 7.8.3(b) and 7.8.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Total amount of coal processed, tons/month and tons/year.
- b. Total amount of ash processed, tons/month and tons/year.
- c. Monthly and annual emissions of PM₁₀ calculated in accordance with compliance procedures established in Condition 7.8.12.
- d. Records of maintenance activities performed for an air pollution control devices.

7.8.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of non-compliance with the emission limitations and emissions of PM₁₀ as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the emission limitation of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.8.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.8.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the pollution control equipment and the work-practices inherent in operation of the affected coal handling and ash processing unit.
- b. For purposes of calculation PM₁₀ emissions from the affected coal handling and ash processing unit, the following equation shall be used:

$PM_{10} \text{ Emissions}^* = (\text{Air Flow, cfm}) \times (\text{Estimated Dust Loading, gr/scf}) \times (1 \text{ lb}/7,000 \text{ gr}) \times (60 \text{ minutes/hr}) \times [1 - (\text{Filter Efficiency } \%) / 100]$.

- * As specified by the manufacturer or vendor of the filter, or air testing of the actual equipment, or testing of similar equipment at this or other facilities, or based on vendor or manufacturer outlet concentration guarantees or predicted outlet emission performance, or based on the standard EPA emission factors such as AP-42. If compliance testing has been conducted to determine mass emission rates, then the test data may be used in lieu of the above. Vendor outlet concentration guarantees and predicted performance, or experience with similar equipment, may be used in place the equation above.

7.9 Unit 9: Gasoline Storage Tank

7.9.1 Description

Gasoline storage tank is associated with gasoline non-retail dispensing operations at this location

7.9.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 7:	Gasoline Storage Tank, 2,500 Gallons Capacity	Submerged Loading Pipe

7.9.3 Applicability Provisions and Applicable Regulations

- a. An "affected gasoline storage tank" for the purpose of these unit specific conditions is used for non-retail dispensing operations at this location.
- b. The affected gasoline storage tank is subject to 35 IAC 215.122(b) and 215.583(a)(1). These requirements are discussed further in Condition 7.9.5.

7.9.4 Non-Applicability of Regulations of Concern

The affected gasoline storage tank is exempted from applicability of 35 IAC 215.583(a)(2) because the tank is located outside the counties designated in 35 IAC 215.583(b)(4).

7.9.5 Operational and Production Limits and Work Practices

- a. No person shall cause or allow the loading of any organic material in any stationary tank having a storage capacity of greater than 946 l (250 gal), unless such tank is equipped with a permanent submerged loading pipe [35 IAC 215.122(b)].
- b. No person shall cause or allow the transfer of gasoline from any delivery vessel into the stationary storage tank at a gasoline dispensing operations unless the tank is equipped with a submerged loading pipe [35 IAC 215.583(a)(1)].

7.9.6 Emission Limitations

In addition to Condition 5.5.1, the affected gasoline storage tank is subject to the following:

None

7.9.7 Testing Requirements

None

7.9.8 Monitoring Requirements

None

7.9.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected gasoline storage tank to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Monthly and annual gasoline throughput (gallons/month and gallons/year).
- b. Monthly and annual VOM emissions calculated based on the compliance procedure in Condition 7.9.12.

7.9.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the emission limitations as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

None

7.9.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.9.12 Compliance Procedures

To determine compliance with Condition 5.5.1, VOM emissions from the storage tank shall be calculated based in the current version of the TANK program.

7.10 Fugitive Emissions

7.10.1 Description

Fugitive emissions at this source are from operations and emission units listed below.

7.10.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Unit 10	Elevator Area (PM/PM ₁₀ Emissions)	None
	• Grain Unloading	
	Wet Milling (VOC, HAP, SO ₂ Emissions): Buildings #4, #6, #11, #14, #153, #154, #155	None
	Refinery (VOC, HAP, SO ₂ Emissions): • Buildings #5 & #10	None
	Waste Water Treatment (VOC and HAP Emissions)	None
	Cooling Towers (VOC & SO ₂ Emissions)	None
	Paved and Unpaved Roads (PM/PM ₁₀ Emissions)	None

7.10.3 Applicability Provisions and Applicable Regulations

- a. The "affected fugitives emissions" for the purpose of these unit-specific conditions, are the fugitives described in Conditions 7.10.1 and 7.10.2.
- b. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source [35 IAC 212.301].

7.10.4 Non-Applicability of Regulations of Concern

N/A

7.10.5 Operational and Production Limits and Work Practices

N/A

7.10.6 Emission Limitations

None

7.10.7 Testing Requirements

None

7.10.8 Monitoring Requirement

None

7.10.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for the affected fugitives to demonstrate compliance with 7.10.3, pursuant to Section 39.5(7)(b) of the Act:

- a. Minimum Operating Program to reduce fugitive particulate matter emissions(35 IAC 212.310) with the following:
 - i. The name and address of the source;
 - ii. The name and address of the owner or operator responsible for execution of the operating program;
 - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source
 - iv. Location of unloading and transporting operations with pollution control equipment;
 - v. A detailed description of the best management practices utilized to achieve compliance with 35 IAC 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
 - vi. Estimated frequency of application of dust suppressants by location of materials; and
 - vii. Such other information as may be necessary to facilitate the Agency's review of the operating program,
- b. Annual calculation of fugitive emissions described in this Subsection.

7.10.10 Reporting Requirements

None

7.10.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.10.12 Compliance Procedures

Compliance with the emission limits in Conditions 5.5.1 and 7.10.3 is assured and achieved by the proper operation and maintenance of the equipment as required by this section, the work-practices inherent in operation of the affected units and emission factors/formulas provided by Permittee.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to the source, the Illinois EPA's written determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after June 13, 2003 unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, or other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement. [Section 39.5(7)(o)(vii) of the Act]

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;
- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational changes; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other process, emissions, or composition parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the conditions of this permit, shall be submitted to the Air

Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

<u>Monitoring Period</u>	<u>Report Due Date</u>
January - June	September 1
July - December	March 1

All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in the permit or in an applicable regulation, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use on an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in the permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA - Air Compliance Section
 Illinois Environmental Protection Agency
 Division of Air Pollution Control
 Compliance Section (#40)
 P.O. Box 19276
 Springfield, Illinois 62794-9276
 - ii. Illinois EPA - Air Regional Field Office
 Illinois Environmental Protection Agency
 Division of Air Pollution Control
 2009 Mall Street
 Collinsville, Illinois 62234
 - iii. Illinois EPA - Air Permit Section (MC 11)
 Illinois Environmental Protection Agency
 Divisions of Air Pollution Control
 Permit Section
 P.O. Box 19506
 Springfield, Illinois 62794-9506
 - iv. USEPA - Air Branch
 United States EPA (AR - 17J)
 Air & Radiation Branch (Illinois - Indiana)
 77 West Jackson Boulevard
 Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.

8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I Provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

- 9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in the permit and as allowed by law and rule. [Section 39.5(7)(j)(iv) of the Act]
- 9.1.2 In particular, this permit does not alter or affect the following:
 - a. The provisions of Section 303 (emergency powers) of the Clean Air Act, including USEPA's authority under that Section;
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program consistent with Section 408(a) of the Clean Air Act; and
 - d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the Clean Air Act.
- 9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of the permit. Any permit noncompliance constitutes a violation of the Clean Air Act and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act]. The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition. [Section 39.5(6)(c) of the Act]

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Environmental Protection Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto. [Section 39.5(7)(o)(vi)] The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois, 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, and after being allowed a reasonable opportunity to verify the legitimacy of credentials and other documents (including photocopying the documents that are presented), the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(p)(ii) of Act]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of the permit. EPA contractors must present documentation that a secrecy agreement is in effect with EPA prior to site entry;

- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, operations regulated or required under the permit;
- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or this Act.
- e. Obtain and remove samples of any discharge or emission of pollutants; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply With Other Requirements

The issuance of this permit does not release the Permittee from applicable state and federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

The permit does not convey any property rights of any sort, or any exclusive privilege.

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes.

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [Section 39.5(7)(e)(ii) of the Act]
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit compliance certifications annually or more frequently as specified in the applicable requirement or by permit condition.

- a. The certification shall include the identification of each term or condition of the permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications must be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by a CAAPP permit shall contain certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(k) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defenses to Enforcement Action

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Section 39.5(7)(o)(ii) of the Act]

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operation logs, or other relevant evidence:
 - i. An emergency occurred as provided in Subsection 7(k) of Section 39.5 of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
 - iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working day of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in the permit.
- b. This provision is in addition to any emergency or upset provisions contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless the permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on the permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

The permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [Section 39.5(7)(o)(iii) of the Act]

9.12.2 Reopening and Revision

The permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that the permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of the permit; and
- d. The Illinois EPA or USEPA determines that the permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(a)(iii) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by the permit or, for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality. [Section 39.5(7)(o)(v) of the Act]

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if the permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force. [Section 39.5(7)(i) of the Act]

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions. [Section 39.5(5)(1) and (n) of the Act]

10.0 Attachments

10.1 Attachment 1 - Emissions Limits Established in Permit 95060239

TABLE I

Potential Emissions from This Project (New Feedhouse Equipment)

Item of Equipment	Source I.D.	Particulate		PM-10		Sulfur Dioxide		Nitrogen Oxides		Carbon Monoxide		Volatile Organic Materials	
		(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)
Boilout Material Storage Tank	154-09	---	---	---	---	1.30	5.69	---	---	---	---	---	---
Fiber Filtrate Tank	155-01	---	---	---	---	2.39	10.50	---	---	---	---	---	---
Light Steep Water Tank	154-08	---	---	---	---	1.20	5.26	---	---	---	---	---	---
Hammermill Collection Conveyor	154-06	0.83	3.64	0.83	3.64	---	---	---	---	---	---	---	---
RSTD Dryers (1 - 4) ^a	154-01 02,03, 04	16.46	72.10	16.46	72.10	16.80	73.60	---	---	---	---	---	---
Rotary Cooler	154-05	1.06	4.64	1.06	4.64	---	---	---	---	---	---	---	---
Gluten Vacuum Filter	14-7	0.05	0.22	0.05	0.22	1.03	4.51	---	---	---	---	---	---
Total Potential Emissions			80.60		80.60		99.60		0.00		0.00		0.00

^a Emission limitations are applicable to all four Rotary Steam Tube Dryers combined.

TABLE IIA
Emission Offsets for New Feedhouse Equipment

Building No. 9 Item of Equipment	Source I.D.	Particulate		PM-10		Sulfur Dioxide		Nitrogen Oxides		Carbon Monoxide		Volatile Organic Materials	
		(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)
North Heil Dryer (72120238)	9-03	1.15	5.03	1.10	4.82	3.44	15.05	5.50	24.09	1.38	6.00	0.12	0.53
South Heil Dryer (72120244)	9-04	10.70	46.87	10.30	44.90	1.85	8.10	3.30	14.45	0.83	4.00	0.07	0.31
No. 1 Flash Dryer (72122889)	9-09	5.29	23.17	4.84	21.20	4.61	20.18	5.50	24.09	1.38	6.00	0.12	0.53
No. 2 Flash Dryer (1st Stage) (72120168)	9-11	12.23	53.55	11.19	49.00	4.03	17.67	3.30	14.45	0.83	4.00	0.07	0.31
No. 2 Flash Dryer (2nd Stage) (72120168)	9-11A	7.85	34.40	7.19	31.47	N/A	---	N/A	---	N/A	---	N/A	---
No. 3 Flash Dryer (72120286)	9-12	3.11	13.64	2.85	12.48	4.61	20.18	5.50	24.09	1.38	6.00	0.12	0.53
Corn Dust Collection (72120256)	9-08	2.40	10.45	2.40	10.45	N/A	---	N/A	---	N/A	---	N/A	---
Dust Systems Aerodynamics (72120287)	9-13	1.79	7.80	1.79	7.80	N/A	---	N/A	---	N/A	---	N/A	---
Corn Germ Meal Conveyor (72120320)	9-24	0.09	0.35	0.09	0.35	N/A	---	N/A	---	N/A	---	N/A	---
Chaff Unloading System (78050009)	9-26	0.09	0.37	0.09	0.37	N/A	---	N/A	---	N/A	---	N/A	---
Offsets from Project			195.63		182.84		81.18		101.17		26.00		2.21

Actual emission offsets are based on historical operating data from the previous two years of equipment operation (May 1993-April 1995).

TABLE IIB

Emission Offsets for New Feedhouse Equipment

Building No. 14 Item of Equipment	Source I.D.	Particulate		PM-10		Sulfur Dioxide		Nitrogen Oxides		Carbon Monoxide		Volatile Organic Materials	
		(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)
DSLS Dryer (76080074)	14-01	0.00	0.00	0.00	0.00	0.03	0.12	6.60	28.91	1.65	7.00	0.13	0.58
Corn Fiber Conveying System (76060045)	14-02	0.20	0.85	0.20	0.85	N/A	---	N/A	---	N/A	---	N/A	---
DSL/C Cooler (84060025)	14-05	0.46	2.01	0.46	2.01	N/A	---	N/A	---	N/A	---	N/A	---
Offsets from Project			2.86		2.86		0.12		28.91		7.00		0.58

Actual emission offsets on historical operating data from the previous two years of equipment operation (May 1993-April 1995).

TABLE III

Net Contemporaneous Change of Emissions

<u>Description</u>	<u>Particulate (Ton/Yr)</u>	<u>PM-10 (Ton/Yr)</u>	<u>Sulfur Dioxide (Ton/Yr)</u>	<u>Nitrogen Oxides (Ton/Yr)</u>	<u>Carbon Monoxide (Ton/Yr)</u>	<u>Volatile Organic Materials (Ton/Yr)</u>
Potential Emissions	80.60	80.60	99.50	0.00	0.00	0.00
Emission Offsets (Bldg. 9)	- 195.63	- 182.84	- 81.18	- 101.17	- 26.00	- 2.21
Emission Offsets (Bldg. 14)	- 2.86	- 2.86	- 0.12	- 28.91	- 7.00	- 0.58
Net Change of Emissions	- 117.89	- 105.1	18.20	- 130.08	- 33.00	- 2.79

10.2 Attachment 2: Emission Limits Established in Construction
Permit 97080061

Table 1

Limits on Proposed Equipment*¹

<u>Designation</u>	<u>Item of Equipment</u>	<u>Emissions</u> <u>Particulate Matter</u>	
		<u>(Lb/Hr)</u>	<u>(Ton/Yr)</u>
26-18	No. 5 Flash Dryer	12.9	56.3
134-32, 33, 34, & 35	Flash Dryer No. 5 Bins	0.3	1.3
134-36	Starch Transfer System from Flash #5 Bins	0.4	1.8
34-6	Starch Bag Packer No. 2	0.6	2.6
34-7	Starch Rail Loadout No. 3	0.3	1.3
		Total = 63.3	

*1 - Limits on PM emissions of new equipment from the starch flash drying system

Table 2

Limits for Proposed Modifications of New Equipment*²

<u>Designation</u>	<u>Item of Equipment</u>	<u>Emissions</u> <u>Particulate Matter</u>	
		<u>(Lb/Hr)</u>	<u>(Ton/Yr)</u>
134-14	Conditioning Air Bagfilter	0.34	1.5
134-18, 19, 20, & 21	Flash Dryer No. 4 Bins	0.3	1.3
134-22, 23, & 24	Flash Dryer No. 3 Bins	0.21	0.9
34-1	Air Wash Dust Collector For Packer No. 1	0.04	0.19
34-5	Air Wash Dust Collector For Packer No. 2	0.04	0.19
		Total = 4.08	

*2 - These limits reflect revisions to the previous limits established by Permit No. 94080118 for this new equipment as a consequence of the proposed modifications. These limits, as applicable to the modified equipment, supersede the limits originally set for the equipment, effective upon startup of the item of modified equipment.

Table 3

Limits on Previous New Equipment*³

<u>Designation</u>	<u>Item of Equipment</u>	<u>Emissions</u> <u>Particulate Matter</u> <u>(Lb/Hr) (Ton/Yr)</u>	
134-15	Starch Blending Bin	0.3	1.3
134-16, 17	Flash Dryer No. 2 Bins	0.1	0.4
134-25, 26	Dry Starch Conv. To Screen Rotex Cyclones	0.8	3.5
134-27	Starch Screening	0.05	0.2
134-28	Starch Truck Loadout	0.3	1.3
134-29	Starch Reslurry System Bin Vent	0.01	0.02
134-30	Starch Reslurry System Bin Filter Receiver	0.09	0.4
34-2	Starch Rail Loadout No. 1	0.3	1.3
34-3	Starch Rail Loadout No. 2	0.3	1.3
34-4	Starch Bag Packer No. 1	0.6	2.6
37-3	Starch Bins and Tote Packers No. 1 and No. 2	0.3	1.3
		Total = 13.62	

*3 - These limits on new equipment in the starch flash drying systems are identical to the original limits in Permit No. 94080118.

Table 4

Limits and Change in Emissions Associated with Previous Modified Equipment*⁴

<u>Designation</u>	<u>Item of Equipment</u>	<u>Emissions</u> <u>Particulate Matter (Ton/Yr)</u>		
		<u>New Limit</u>	<u>Past Limit</u>	<u>Change</u>
26-04	No. 2 Flash Dryer Surge Hopper	0.2	0.17	0.03
26-10	No. 2 Flash Dryer	13.1	26.4	-13.3
26-11	No. 2 Flash Dryer Milling	0.0	1.5	-1.5
26-12	No. 3 Flash Dryer	21.9	28.5	-6.6
26-12A	No. 3 Flash Dryer Prod. Coll.	0.0	2.3	-2.3
26-13	No. 3 Flash Dryer Surge Hopper	0.4	0.4	0.0
		Totals = 35.6		-23.67

*4 - These limits and changes in emissions on previous modified equipment in the starch flash drying systems are identical to the original limits and changes in Permit No. 94080118.

Table 5

Emission Increases (1992-1997) *⁵

<u>Description</u>	<u>Permit</u>	<u>Emissions Particulate Matter (Ton/Yr)</u>
Corn Belt Transfer Point	97060126	1.18
Germ Cooler System	97040097	5.74
Polydextrose Manufacturing	97010067	0.93
Starch Thinning Process	96010053	6.57
75 Bldg. Operations	95080143	26.44
Vico Spray Dryer	94110072	12.77
Starch Flash Dryer #4 System	94090060	35.9
59 Bldg. - Pilot Plant Spray Dryer	90090017	0.41
99 Bldg. - Dextrose Facility	86120033	7.15
Decatur Elevators	86040052	1.7
Filter Aid Unloading System	81090061	0.12
Starch Flash Dryer No. 1 System	72120271	0.75
44 Bldg. - Dextrose Facility	72120248	10.4

Total = 110.06

*5 - This table shows all other increases in PM emissions which have occurred within the contemporaneous time period 1992-1997.

Table 6

Emission Decreases (1992-1997) *⁶

<u>Description</u>	<u>Permit</u>	<u>Emissions Particulate Matter (Ton/Yr)</u>
Starch Belt Dryers 12 & 20 Bldg.	94090060	-87.5
Gluten Feed & Meal Drying Systems	95060239	-105.11

Total = -192.61

*6 - This table shows all decreases in PM emissions which have occurred within the contemporaneous time period 1992-1997.

10.3 Attachment 3 - Allowable Emissions of Particulate Matter

10.3.1 Process Emission Units for Which Construction or Modification Commenced Prior to April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
- b. The emissions of particulate matter into the atmosphere in any one hour period from the affected unit shall not exceed the allowable emission rates specified in the following equation:

$$E = C + A (P)^B$$

Where:

P = Process weight rate

E = Allowable emission rate

- i. For process weight rates up to 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

- ii. For process weight rates in excess of 27.2 Mg/hr (30 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	- 18.4	- 40.0

- c. Limits for Process Emission Units for which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

<u>Metric</u>		<u>English</u>	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.5	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

10.3.2 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972

- a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
- b. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A(P)^B$$

Where:

P = Process weight rate

E = Allowable emission rate

- i. For process weight rates of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

- ii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	<u>English</u>
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

- c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.4 Attachment 4 - Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

10.5 Attachment 5 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

1. Administrative Permit Amendment;
2. Minor Permit Modification; and
3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment
 - Corrects typographical errors;
 - Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
 - Requires more frequent monitoring or reporting by the Permittee;
 - Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
 - Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
 - Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.
2. Minor Permit Modification
 - Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;

- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

- A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms>.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

Application For Construction Permit (For CAAPP Sources Only)	For Illinois EPA use only
	I.D. Number:
	Permit Number:
	Date Received:

This form is to be used by CAAPP sources to supply information necessary to obtain a construction permit. Please attach other necessary information and completed CAAPP forms regarding this construction/modification project.

Source Information		
1. Source name:		
2. Source street address:		
3. City:	4. Zip Code:	
5. Is the source located within city limits?		<input type="checkbox"/> Yes <input type="checkbox"/> No
6. Township name:	7. County:	8. I.D. Number:

Owner Information		
9. Name:		
10. Address:		
11. City:	12. State:	13. Zip code:

Operator Information (if different from owner)		
14. Name		
15. Address:		
16. City:	17. State:	18. Zip code:

Applicant Information	
19. Who is the applicant? <input type="checkbox"/> Owner <input type="checkbox"/> Operator	20. All correspondence to: (check one) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Source
21. Attention name and/or title for written correspondence:	
22. Technical contact person for application:	23. Contact person's telephone number:

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents	
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs: a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?
	<input type="checkbox"/> Yes <input type="checkbox"/> No
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.
	<input type="checkbox"/> Yes <input type="checkbox"/> No
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?
	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable, No TRADE SECRET information in this application

Note 1: Answering "No" to any of the above may result in the application being deemed incomplete.

Signature Block	
This certification must be signed by a responsible official. Applications without a signed certification will be returned as incomplete.	
30.	I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete. Authorized Signature: BY: _____ <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center;"> _____ AUTHORIZED SIGNATURE </div> <div style="text-align: center;"> _____ TITLE OF SIGNATORY </div> </div> <div style="display: flex; justify-content: space-between; margin-top: 10px;"> <div style="text-align: center;"> _____ TYPED OR PRINTED NAME OF SIGNATORY </div> <div style="text-align: center;"> _____/_____/_____ DATE </div> </div>

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.7 Attachment 7 - Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

1. A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
3. A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
7. a. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at <http://www.epa.state.il.us/air/forms.html>.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
P.O. Box 19506
Springfield, Illinois 62794-9506

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